From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Retirement Living Council Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 4:20:45 PM
Attachments: image001.jpg
image002.png
RLC Submission GARP.pdf

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Good afternoon,

On behalf of the Retirement Living Council, please see the attached submission to the Greater Adelaide Regional Plan Discussion Paper.

Kind regards,

Oliver Luckhurst-Smith
National Policy Manager | Retirement Living

Accreditation | Greenways Retirement Village

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6 November 2023

Greater Adelaide Regional Plan

State Planning Commission

Retirement Living Council's Response to Discussion Paper

About the retirement living industry

Retirement communities offer a unique housing option that enhances wellbeing and lifespan for older Australians. Importantly, these communities can delay entry into residential aged care, and in some cases can even prevent it entirely.

Independent data shows that residents in retirement communities are on average happier, healthier (both mentally and physically) and are more socially connected and active.

Importantly for the aged care and health sectors, research helps inform industry and government that residents in retirement communities have reduced interactions with GPs and hospitals and delayed entry into aged care. This results in significant cost efficiencies for governments by reducing pressure on the aged care and health sectors.

As a result, there is great potential to increase these benefits to governments if the retirement industry is provided the requisite support to evolve and grow to meet the increasing needs of Australia's ageing population.

When older South Australians are able to rightsize, they not only improve their quality of life but also contribute to societal, economic and environmental benefits for our state. It also brings with it the added benefit of freeing up traditional housing stock for young people, couples and growing families.

About the Retirement Living Council

The Retirement Living Council (RLC) is the national peak body for Australia's retirement living sector, championing policies that deliver age-friendly homes and better services in retirement communities.

The RLC sits within the Property Council of Australia's national advocacy team and is the most powerful voice of the sector, representing national retirement village and seniors living community operators, including for-profit and not-for-profit providers.

Response to Discussion Paper

The RLC welcomes the opportunity to respond to the State Planning Commission's discussion paper on the Greater Adelaide Regional Plan (the plan).

As the successor to the 30-Year Plan for Greater Adelaide, it is imperative that this new plan provides for adequate and diverse housing solutions for South Australians at all phases of their lives.

It is no secret that Australia, South Australia in particular, is undergoing a major demographic change. The *2023 Intergenerational Report* identifies that there are currently 4.6 million people aged over 65 today, growing to 7.1 million by 2043.

There are currently 166,000 South Australians over 75 today, growing to 256,000 in 2040. This means there are 256,000 reasons to ensure that ageing remains a strategic priority for the State Government.

While the discussion paper does make reference to the 19.3 per cent of South Australians over 65, this is the extent of discussion about our ageing demography. This sits in contrast with the 2017 update of the 30-Year Plan for Greater Adelaide (30-Year Plan), which acknowledged:

> "Our baby boomers (who represent a quarter of our population) are either moving into retirement or are already retired. Many wish to downsize and move into accommodation that better suits their needs and lifestyles."[1]

At the heart of its submission, the RLC notes that retirement communities meet the needs of the ageing population by providing an environment where older Australians are able to maintain their independence and lifestyle, with ready access to health, wellbeing, care and support services.

Across the country, the retirement living industry's market penetration of over-75s is 12.6 per cent, meaning this purpose-built housing type is doing important work for both consumers and governments.

Therefore, more emphasis needs to be placed on the diversity of housing options available to ageing South Australians, like retirement communities, including a **reinstatement of 2017 references to 'downsizing' or 'rightsizing' into future decision-making around accommodation for older South Australians**.

[1] The 30-Year Plan for Greater Adelaide, 2017 Update, p 152

What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider?

The Guiding Outcomes, particularly as they relate to "A more equitable and socially cohesive place" and "A greater choice of housing in the right places" should be expanded to highlight the need for a diversity of age-appropriate housing types.

South Australia's Plan for Ageing Well 2020-2025 sets a strategic theme to investigate "Models and options for creating homes that suit the diversity of needs and aspirations" for older South Australians.[2] Action 27 of the 30-Year Plan required the development of a "policy framework to support projects that provide for aged care and retirement accommodation to meet growing demand."[3] The RLC submits **the reintroduction of this action item in the Greater Adelaide Regional Plan would positively signal consideration of these housing options for ageing South Australians**.

What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?

Addressing the supply pipeline

Retirement units across South Australia (particularly in metropolitan areas) are effectively at full capacity, however despite this, the *2022 PwC/Property Council Retirement Census* indicates that there are only 181 units scheduled in the supply pipeline until 2025.[4]

While the Planning and Design Code does provide for 'retirement facilities' to feature as deemed-to-satisfy items in certain planning applications, more can be done to incentivize the development of retirement communities to ensure a steady supply pipeline into the future.

One way of ensuring housing diversity and the freeing up of older stock is to **establish minimum land allocations for retirement communities in new greenfield developments**.

Greater access to land for retirement communities through minimum land allocations in under-supplied areas, similar to targets placed on social and affordable housing can ensure suitable options for the ageing population, as well as address housing supply issues. **The RLC is also advocating for the inclusion of retirement facilities under the Housing Australia Future Fund as a key delivery component of achieving South Australia's supply target.**

Dwelling suitability

The 2017 update of the 30-Year Plan for Greater Adelaide identified that 62 per cent of households have fewer than three residents but 72 per cent of dwellings have three of four bedrooms.[5] In 2021, nearly three quarters of people aged 75 and over were living in dwellings where they have one or

[2] *South Australia's Plan for Ageing Well 2020-2025* p 30
[3] *The 30-Year Plan for Greater Adelaide, 2017 Update*, p 70
[4] *2022 PWC Property Council Retirement Census* p 7
[5] *The 30-Year Plan for Greater Adelaide, 2017 Update*, p 152

more bedrooms spare. This represents more than 1.4 million older Australians that are residing in dwellings that are oversized for their needs.

This inefficient use of space also adds pressure on existing housing supply challenges. Due to slow supply, Australia is expected to see a shortage of 101,400 dwellings between 2023 and 2030. Freeing up housing stock can work to address these challenges. The Greater Adelaide Regional Plan is targeting 300,000 new homes for South Australia by 2051 alone.

At the same time, one in five Australians over 65 also require assistance with domestic tasks, including property maintenance (20 per cent) and household chores (16 per cent). These needs rank second and third only to healthcare.

This suggests that the majority of older people are not rightsizing, and many are requiring extra supports to continue living in their family home. Larger dwellings can also increase health risks as people age, with most cases of falls in older people occurring at home. Features such as stairs without railings, clutter or poor lighting can create hazards for older people.

Affordability

Addressing the 'missing middle' requires a diversity of housing options that enable affordable living. Retirement living is designed to provide an affordable rightsizing option, with entry prices for an average 2-bedroom unit in metropolitan Adelaide being 44 per cent lower than the median house price in the same postcode. Outside metropolitan Adelaide, units across the rest of South Australia are 36 per cent more affordable.

Across Australia, the average two bed Independent Living Unit (ILU) price grew by 6.6 per cent over the 18 months to December 2022, while national house prices over the same period rose by 26.2 per cent indicating a less volatile retirement market than what has been experienced in South Australia in the recent past.

Increasing density with more care and support services

While a conventionally single storey housing proposition, there has been an increase in the development of vertical communities, which better enable these communities to be developed in high-density areas, allowing residents to better access the resources and amenities of their broader, local area.

Additionally, 53 per cent of new villages under development have indicated that a residential aged care facility will be provided on-site or co-located.[6] While retirement communities already enhance residents' health through onsite access to healthcare professionals, the co-location of offerings such as aged care allows a more supportive environment as residents requirements change.

[6] *2022 PWC Property Council Retirement Census* p 7

Energy efficiency

Rightsizing can allow a more efficient use of energy by households, therefore reducing the overall annual energy consumption for older Australians by around 35 per cent.

Energy usage is driven by the size of the dwelling and number of occupants residing in it. Larger spaces require more operational energy driven by temperature regulation, such as cooling and heating. A larger number of occupants also drive energy usage of a dwelling, mainly due to more frequent usage of temperature regulation, appliances and electronic devices.

When rightsizing occurs, a retired couple is assumed to move into a retirement dwelling, allowing a family of four to move into the vacant dwelling. While this leads to a 17 per cent increase in energy consumption of the family, despite this, rightsizing results in a net reduction of 7 per cent.

In Conclusion

The RLC appreciates the opportunity to share our leading industry insights with the State Planning Commission. The Greater Adelaide Regional Plan is an important document to set the tone for development priorities in the future.

While the RLC remains agnostic on many of the themes explored in Part 2, 'Where should Greater Adelaide grow?', we agree that housing availability and affordability will remain a key driver for South Australians for years to come.

At present, the Greater Adelaide Regional Plan does not give the same consideration to age demographics and the housing types required to service these demographics that the 30-Year Plan did, which we request is addressed in future iterations.

A balance between government funding, consumer choice, and industry innovation is essential to create an inclusive, adaptable, and effective housing landscape.

Essentially, we believe that success is achieved through empowering consumers with choice, supporting innovation, and delineating appropriate roles for both government and private investment which will drive the evolution of housing across Australia.

Daniel Gannon

Executive Director
Retirement Living Council

From: [redacted]
To: DTI:PlanSA Submissions
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Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Tuesday, 7 November 2023 4:46:57 PM
Attachments: image001.png
image002.png
20231106 Property Council GARP Submission v01 rgf.docx

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To whom it may concern,

On behalf of the Property Council, please find attached our submission re the Greater Adelaide Regional Plan.

Regards

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Deputy Executive Director

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6th November 2023

Property Council – Greater Adelaide Regional Plan

The Property Council welcomes the opportunity to provide a response to the Greater Adelaide Regional Plan discussion paper.

The Property Council of Australia is the leading advocate for Australia's largest industry – property.

Our members have a direct interest in the policies that guide land use planning in Greater Adelaide and South Australia.

Our industry represents 13% of Australia's GDP and employs 1.4 million Australians. Property Council member organisations are investors, owners and managers of real estate across all major asset classes including commercial, offices, residential, industrial, hotels and more.

A cohesive vision and plan for how land is used in the Greater Adelaide region is critical in ensuring adequate provision of infrastructure, housing and amenity to that supports the built form requirements of our economy and the communities that sustain it.

Our response is structured under the four major outcome areas outlined in the discussion paper, namely:

1. A greener, wilder and climate resilient environment
2. A more equitable and socially cohesive place
3. A strong economy built on a smarter, cleaner, regenerative future
4. A greater choice of housing in the right places

We thank the Minister for consideration of our submission.

Bruce Djite
SA Executive Director, Property Council

1. A greener, wilder and climate resilient environment

South Australia is a leader in renewable energy generation and recognises the importance of decarbonisation for climate resilience, however the 30-year plan should more explicitly recognise the crucial role of the built environment in achieving decarbonisation by 2050 and should prioritise a policy framework to support ambitious targets for both new and existing buildings.

The Property Council advocates that the Greater Adelaide Regional Plan:

Reduce energy emissions through adaptation of existing buildings and well-designed new buildings.

New buildings must be high-performance and energy efficient. This requires NCC controls, ratings schemes and incentives. While a local approach to implementation is important, the Property Council also advocates for a nationally consistent methodology for the measurement of factors such as embodied carbon, lifecycle analysis, thermal performance requirements and energy usage, and applying a cohesive approach across commercial, industrial and residential buildings. In addition, reporting frameworks need to be consistent to support accurate and credible sustainability claims, which in turn incentivises good performance.

Key Points

1. **Promote climate resilient buildings.**
   This strategy will ensure new buildings are energy efficient having financial benefits for future occupants. The implementation of climate resilient buildings should be an incentive-based approach that enables industry to adapt and capitalise on the economic opportunities that can be achieved.

2. **Adapt existing buildings.**
   Most of the building stock we will use in 2050 is in existence today. Existing buildings are therefore critical in addressing emissions reduction targets. Policies should increase support and funding for electrification and thermal retrofitting of existing building stock.

3. **Support market transition.**
   To ensure a positive impact on the economy, the GARP should include policy and funding to promote a market transition to create skills training and employment in sustainable industries such as energy generation, retrofitting, manufacturing and electrification. This will assist trades to reskill away from the standard approach and will also assist professional bodies to implement changes to design standards and reporting.

Climate Change Resilience through Sustainable Development – Existing and New Communities.

As more people than ever are living in urban environments, we need to reimagine the way cities are designed, as well as their critical role in assisting with adaptation to and mitigation of climate impacts. Decisive action is required to avoid the worst projected impacts of climate change. Adelaide and its environs must shift towards the provision of high amenity, high liveability, medium-density metropolitan living, supported by great public transport. This is critical for both infill and new development.

Key Points

1. **Sustainable Greenfield Developments.**
   Release of new greenfield developments should be subject to best practice sustainable planning and should have associated and linked investment in mass transit networks to reduce vehicle travel.

   The Property Council supports the establishment of infrastructure and growth compacts between state and local governments to better align housing delivery with economic and social infrastructure. These should deliver new housing at the same time as transport, schools, libraries, shops and public spaces, to support the 'living locally' approach presented in the GARP Discussion Paper.

2. **Well designed and located strategic infill can enhance sustainability.**
   Strategic infill development and renewal should be strongly prioritised to intensify development around existing transit and local community hubs (including suburban and regional locations). These developments should be matched by expenditure on social infrastructure and outdoor space, greening and natural restoration, as higher targets are required to support successful higher density communities. We also call for investment in research to build a strong evidence base that supports the business case for amenity and sustainable infrastructure.

Rethinking transportation to build more climate change resilient cities.

Transport is the largest contributor to greenhouse gas emissions in the state, responsible for 29% of all emissions. The design of Australian cities fundamentally influences individual behaviour – we are dealing with a legacy that promotes private vehicle use and makes active and mass transit difficult. We need to plan cities for better transport, dramatically shifting investment in our transport infrastructure towards a more sustainable direction, and this needs to work closely with development projects to ensure coordinated outcomes.

Key Points

1. **Plan growth to promote the use of sustainable transport modes.**
   We call for the creation of integrated transport authorities to ensure we improve sustainable mobility within our cities and explore sources of redirected investment capital to fund mass and active transport infrastructure deficits. Transportation strategies should dramatically reduce car dependency.

2. **Redirect investment to active transit and sustainable mass transportation networks.**
   Investment in infrastructure projects including train, tram networks and bus networks should be increased. Infill and new development should where possible include bikeway infrastructure and separated bike lanes.

3. **Develop transport strategies that reduce car dependency.**
   New building projects should also foster active transit, through reduction in minimum requirements for residential car parks and an increase in the minimum provision for alternate transport e.g., secure cycle storage and end of trip facilities. It is recognised that the transition away from car dependency will involve social change as well as physical changes to the environment.

Support 'rewilding' of urban areas

We rely on urban nature to improve social and environmental conditions and to add amenity value to our cities. Confronting the challenges of global warming and environmental decline requires new forms of infrastructure and new approaches to landscape planning and management in urban and regional settlements.

Key Points

1. **Plan green infrastructure and biodiversity into projects.**
   Planning for growth should include green infrastructure and biodiversity planning techniques that cross jurisdictional and site boundaries. It should be considered at an infrastructure systems level, as they are reliant on interwoven ecosystems, waterways, land and habitat corridors. The GARP could include broad ecosystems management strategies that can be measured, valued and deployed at a scale that transcends private and public land, geographical boundaries, and that can clearly inform and improve development. These considerations should however not impede the rate of development but rather inform better planning and management of land.

2. **Provide strategies to promote urban greening.**
   Development should include stronger targets to reduce impermeable hard surfaces and identify all potential area for greening, including verges, streets with integration into buildings, for thermal regulation, shade, and food production. Clarity of regulation and incentives are required to increase greening and habitat replacement within developments, and more cohesive integration into buildings. Opportunities for economic growth through sustainable green infrastructure should be identified, such as small scale innovative urban agricultural development into existing urban fabric.

3. **Promote evidence-based frameworks.**
   Rewilding is hard to achieve when its contribution is not measured within an economic framework. We call for high quality green infrastructure research to promote its value and to improve policy formulation. We advocate for strong industry engagement and funding in green infrastructure strategies for urban design and development. All the new and infill development proposed in the GARP is a key opportunity to reconnect cities with the natural world and its resources, and to integrate the restoration of ecosystem functions into urban contexts.

2. A more equitable and socially cohesive place

Social and service infrastructure is closely tied to how we live. Infrastructure shapes our cities, connects people to places, affects our health and wellbeing, and influences our future prosperity.

To provide an equitable and socially cohesive place infrastructure needs to be carefully planned and ready to be delivered as the demand arises.

The Government, State Planning Commission and infrastructure providers must demonstrate strategic leadership in planning, and establishing delivery frameworks, for the infrastructure that underpins our community.

Infrastructure therefore is not just the realm of engineers and planners but requires an evidence-based approach that involves a range of disciplines to maximise the benefit of infrastructure investments.

Our members are seeking an approach to infrastructure planning that creates confidence, is transparent, equitable, evidence-based, and predictable. The current ad hoc nature of infrastructure negotiations is unsustainable and creates costly delays to all parties. The infrastructure liability associated with projects in a time of escalating project costs, has added significant risk to projects at all scales, including small infill sites or significant urban growth projects. It is not only creating costly delays but is a key contributor to "the housing crises".

The GARP should encourage State and Local Government to prioritise infrastructure planning and understanding the capacity of what's above and below the ground. The capacity of stormwater systems and local street networks is often not well understood and is important to the growth of minor infill and strategic infill sites. A greater emphasis on standardisation of infrastructure requirements would assist in enabling infrastructure to be costed into projects upfront and before significant commitments have been made.

The Planning, Development and Infrastructure Act 2016 identifies that a regional plan must include a long-term vision for the region, including 'provisions about the integration of land use, transport infrastructure and the public realm'. Thus, infrastructure and services will need to be front of mind in this new plan.

The Property Council advocates that the Greater Adelaide Regional Plan:

Provides a clear connection between growth precincts and infrastructure planning.

The GARP is a plan to manage growth and change. It will identify precincts where our growing population will be accommodated and where employment opportunities will be created. In areas for growth the required trunk infrastructure must be understood, including utility infrastructure. At the local level, infill precincts will need to be evaluated to determine the potential need for upgrades to local infrastructure. Councils should be proactive and investigate these issues for inclusion in the plan.

Key Points

1. **Evidence-based planning – identify what infrastructure is needed and when.**
   The GARP must identify the high-level infrastructure requirements for growth areas and the trigger points for infrastructure provision. This provides certainty around the economic cost and investment required for growth precincts. This will require an evidence-based approach to understand existing capacities and requirements.

Includes clear guiding principles to inform funding contributions and delivery of infrastructure.

While the private sector has a role in contributing to infrastructure costs, greater certainty about what needs to be contributed and when, is crucial in the financial viability and risk profile of projects. Having clear principles to guide infrastructure funding would provide greater confidence and reduce case-by-case negotiations causing costly project delays.

The required social and physical infrastructure requirements for growth precincts should be identified upfront and the infrastructure delivery mechanism identified. Figure 5 in the Discussion Paper identifies an infrastructure cost schematic. While an individual development can trigger new infrastructure at the state level (e.g., an arterial road), the beneficiary of the infrastructure is far reaching.

Key Points

1. **Predictability of costs and requirements.**
   The development industry benefits from logical and predicable requirements that can be costed into projects upfront. Understanding contribution expectations at the feasibility stage of projects is critical.

2. **Fair and equitable infrastructure models.**
   Contributions should be fair and equitable and reflect the range of beneficiaries of the infrastructure. Proponents should not be required to fund legacy issues or make the full contribution where they are the last project to 'tip it over'. Currently, there is no oversight of infrastructure charges imposed by Councils, which can vary significantly and create significant uncertainty.

3. **Strong governance to support infrastructure planning and delivery.**
   The alignment of State and Local Governments and other infrastructure providers is critical to ensure infrastructure is delivered for growth precincts. This includes service providers such as SA Water, SAPN and DIT whose alignment is required to provide support for growth priorities.

Identify social infrastructure requirements and land to accommodate it through master planning processes.

Key points

1. **Locational challenges for social infrastructure**
   GARP should assist in breaking down perceptions about where social infrastructure should be located, particularly related to affordable and social housing and mental health. These uses should have simplified planning processes with zones that encourage their development and allow movement between land uses i.e., aged care to mental health, hotel to hospital etc.). Early engagement in strategic planning for human services to facilitate effective infrastructure planning providing efficiencies across multiple stakeholders and best mix of physical infrastructure in the right locations.

2. **Land availability for social infrastructure**
   Undertaking social infrastructure assessments assist in ensuring needs can be addressed through the development of master planned communities. Currently, not for profit organisations and government agencies compete for land in well located areas to provide the required services. New approaches to resolving this issue could be an action in the GARP.

3. **Sustainable planning with a long-term view**
   Embed sustainability principles into the planning, design and delivery of infrastructure and its integration into well designed urban precincts. Early planning can support a range of more sustainable transport options as well as a more adaptive infrastructure that can respond to changing community preferences and needs.

3. A Strong Economy Built on a Smarter, Cleaner, Regenerative Future

An economy's strength is measured by its performance across three fundamental factors: namely productivity, population, and participation.

A highly productive economy will be one that sustainably maximises the throughput generated by its most scarce and valuable resources. These resources are land, capital, and people. Land is inherently scarce, and so policy governing its intelligent and productive use merits particular attention to ensuring the State's economic growth over the next 30 years.

As previously noted, South Australia was recently rated as having the most competitive business tax and planning regime in the nation according to the Business Council of Australia. The efficiency of the planning system and sophistication of the policy that governs its operation are integral to the State's investment attractiveness and growth prospects.

The GARP can play an active role in shaping how land use influences future investment, talent, employment, trade, infrastructure, health, education, energy, and sustainability outcomes to name but a few.

The discussion paper notes digitisation, decentralisation, automation and advanced manufacturing, workforce, skills and migration and changing mobility systems as key trends and drivers.

Members of the Property Council in South Australia propose that the GARP should optimise land use, balancing these factors and a number of other considerations.

A modern sophisticated economy necessitates well situated land that can cater for the business requirements of distribution centres, manufacturing, industrial, logistics and warehousing facilities.

It is vital that the GARP incorporates land use planning that enables a diverse economy characterised by multiple resilient and future proofed industries.

The Property Council advocates that the Greater Adelaide Regional Plan:

Is flexible and provides choice, allowing for a diversity of commercial uses that can enable Greater Adelaide to attract and maintain its skills base.

A smart economy requires smart people.

The 'brain drain' phenomenon in South Australia is well known.

The South Australian Government has embarked upon a policy trajectory that seeks to reverse this trend by increasing the capacity of the State's economy to engage in increasingly complex economic activities and grow the number of local high paying jobs to retain talent.

This is underpinned by the government's investment in education and engagement with transformative endeavours such as the university merger, AUKUS and the hydrogen industry.

Key points:

1. **Create a clear vision.**
   A vision for Greater Adelaide that accounts for how land will be intelligently utilised to attract and retain highly productive, highly skilled people to contribute to our economy is worthy of deep consideration.

2. **Attract workers through quality working environments.**
   Complex industries will increasingly seek to attract talented cohorts of people by offering high-amenity employment space. This is true not only in the office market but in the kinds of industries that occupy land outside the CBD.

   As traditional blue collar working environments integrate technologies that improve productivity and require a more sophisticated workforce to compete, employees will increasingly demand higher degrees of amenity with infrastructure and services that entice them to participate in these jobs.

3. **Provide strategic employment land that's connected to a diverse housing offering.**
   Land designated for strategic employment needs to be situated in relative proximity or with ample, frequent, and rapid connectivity to a diversity of housing options (including high and medium density, build-to-rent, student accommodation and retirement living) that can accommodate a critical mass of population providing the human capital required to drive a range of industries.

4. **Establish mixed use employment precincts.**
   The needs of employees regarding services and amenities are important. Mixed use precincts that improve employee experience are attractive to companies who want to compete to acquire highly skilled people and retain them.

Preserve scarce land such as 'last mile space' and land connected to transport infrastructure.

The pandemic reinforced the essential nature of "last mile space".

Last mile space refers to storage and warehousing facilities in or near CBD's and town centres.

With consumer behaviour during Covid necessitating a rapid expansion in online shopping, traditional supply chains across Australia came under immense pressure. Storage facilities close to large urban populations became increasingly vital to ensure a continuity of supply.

Key Points

1. **Protect land for last mile logistics.**
   Members who act in the industrial market report that there is a trend by more and more companies towards operating sites that are more numerous but smaller in size. These companies seek a competitive advantage by being able to replenish stock more rapidly by holding inventory closer to the point of sale ensuring supply chain resilience and maintaining customer loyalty. Due to the current housing crisis, high quality urban infill sites, are naturally of important strategic value. However, last mile space that is well situated is difficult to replace once it is converted into residential thus making its preservation highly important. Not only does this have economic benefits, but it has positive sustainability outcomes with reduced heavy vehicle movements in urban centres.

2. **Identify and protect land close to Airports and key freight infrastructure.**
   Good quality land that is well connected to key infrastructure such as the airport is highly valued. This provides companies with domestic and international air freight requirements significantly lower transportation costs.

   It is worth noting that Property Councils 2022 election platform outlined that the UK Airport Commission found that a 10 per cent increase in seat capacity (proxy for connectivity) increased short-term GDP by 1 per cent., product exports by 3.3 per cent and foreign direct investment inflows by 4.7 per cent.

Drive policy that enables robust forward planning and delivery mechanisms for provision of strategic employment lands.

Long-term planning for economic growth is critical, and understanding market trends and demand for land must be a clear focus of the GARP.

Key Points

1. **Orderly and transparent process for the delivery of development ready land**
   The State Government has recently appointed a Housing Infrastructure Planning and Development Unit to work across government agencies, council, and utilities to ensure the right infrastructure and services is in place to support the housing.

   The Property Council would assert that to accelerate and boost employment a similar, properly resourced unit should be established with regards to employment land. This unit should have powers to monitor land use, investigate requirements and coordinate government agency inputs to ensure sites are brought to a state of development readiness.

2. **Curate market led industrial and employment precinct requirements.**
   Understanding the land requirements of the industries the government desires to attract is critical. An intimate knowledge of the requirements and priorities of business in respect of issues such as proximity to transport infrastructure, energy use, customers and suppliers is important to building a high-resolution image of the land requirements desirable for Greater Adelaide's future economy.

   It is critical to ensure industry is engaged to understand the dynamic nature of employment precinct requirements and to ensure decision-making is evidence based. A granular evidence and data driven solution to understand land availability for employment space is encouraged so that Government and the private sector can collaborate.

3. **Provide flexibility to enable new businesses to thrive and diversify over time.**
   Employment land demand is less predictable than residential land supply. The Property Council would counsel against prescriptive policy that puts the brakes on innovation and ensure that continuous change in local and global conditions is considered as part of a resilient forward focused planning system.

4. A Greater Choice of Housing in the Right Places

With projections forecasting Greater Adelaide's population growing by up to 670,000 people over the next 30 years, decisions informing where and how we should grow our housing requires bold decision-making geared towards strengthening the liveability, sustainability, and economic prosperity of the region. Growing diversity in housing stock - with a holistic vision informing its placement - will be integral to enhancing the State's growth and liveability over the next 30 years.

In 2023, Adelaide surged up The Economist's Global Liveability Index, catapulting from the 30th position to the 12th, making it one of the world's most desirable cities to live in. To maintain and further improve this ranking, it is essential that South Australia continues to be an affordable and desirable place to live and work in Australia.

Members of the Property Council in South Australia advocate for GARP initiatives that will strengthen Adelaide's liveability brand by presenting a bold and comprehensive vision for the state's growth and positioning both locally and globally. This plan should encompass the promotion of intelligent diversity in market-lead housing typologies, offering choices for residents at every stage of life. Additionally, it should provide a holistic vision for optimizing land use, striking a balance between creating world-leading living environments and fostering opportunities for economic growth that support them.

The Property Council advocates that the Greater Adelaide Regional Plan:

Promotes growth of the City Centre

The opportunity remains to fulfill Adelaide's internationally acclaimed urban plan, strengthening the city's growth potential and reinforcing its reputation as a liveable, dynamic, and vibrant urban environment through an increased focus on infill development. To invigorate Adelaide's urban core and enhance its vibrancy, it is imperative to prioritize and incentivize higher density living within and around the city centre. This approach aligns with the spirit of our renowned city plan, consolidating critical mass in our vibrant "Festival State" core.

A true city in a park - Adelaide stands as the world's sole city enveloped by Park Lands. It is a place that can be easily experienced and explored by virtue of its grid-like plan of wide streets, terraces, and public squares. Internationally recognised as one of the most important influences on the Garden City Planning movement, Adelaide's untapped potential continues to offer an ideal canvas for shaping the city of tomorrow through increased population and density which the city can support. The abundance of existing social infrastructure and amenities can pave the way for a city that combines a strong sense of place and sustainable urban development, with well-being at its core.

As indicated in the plan, the 'Adelaide' sub-region has contributed only 10% (13,131) of the greater region's population growth distribution from 2011 to 2021. To bolster this figure, the plan should boldly advocate for a more significant portion of our state's growth to occur in Adelaide's city centre, where distinctive liveability characteristics have already been established. Achieving this requires a balanced approach that identifies future residential growth areas while placing equal emphasis on urban expansion and strategic higher-density urban infill.

Addressing the planning challenges that come with this endeavour, such as airport building height restrictions, adaptive reuse of heritage buildings, and activating ground floor spaces, is crucial to unlock the city centre’s growth potential. Whether it's for student housing, essential workers' accommodation, apartment living, heritage building preservation, or office space conversion, city developments must be both attractive and affordable, catering to a diverse range of residents. These strategies are key to unlocking Adelaide's full potential and securing its place as a world-class, liveable city.

Key Points

1. **Enhance Adelaide's brand through a clear vision.**
   Promoting growth in the city will bolster Adelaide's brand and support local and global initiatives, emphasizing liveability and our unique attributes, such as our vibrant festival scene in the continued effort to reverse Adelaide ‘brain drain’ and reach the upper limits of our population growth targets.

2. **Social equity.**
   Promote higher density living in the city areas grants more people access to established world-class amenities and social infrastructure such as our Park Lands, promoting social equity.

3. **Creating diverse living environments.**
   Encouraging higher density living around the core will lead to a more diverse living environment with critical mass, fostering vibrancy and community engagement.

4. **Leveraging existing infrastructure.**
   Adelaide's core is surrounded by ample infrastructure and amenities, including the Adelaide Park Lands. Leveraging these resources can lead to more sustainable and vibrant urban development.

Supports infill and missing middle housing typologies within inner and middle suburbs

The Property Council supports balancing the need for infill growth, with new developments on the fringe. To facilitate sustainable growth while ensuring housing availability and supply, we support the promotion of 'missing middle' housing typologies as a suitable form of infill development.

Given that 75% of homes in the region are detached dwellings, and with a 78% increase in single households since 1991, the strategy to promote missing middle housing typologies aligns with changing demographics and housing requirements outlined in the plan. At its core, this approach advocates for housing options that serve as a transitional bridge between low-density and high-density living. Missing middle housing comprises house-scale buildings with multiple units that are compatible in scale and form with detached single-family homes, all within a walkable neighbourhood. This approach not only preserves the appeal of mixed housing typologies but also ensures greater accessibility for all.

We understand that ad hoc infill development has created challenges within existing areas. However, care needs to be taken when reducing this form of housing supply without simultaneously releasing sufficient alternative housing options within the inner and middle ring suburbs of Adelaide. The current 'housing crises' is illustrative of our land supply not being ready to take up demand.

Key Points

1. **Support sustainable growth.**
   It is crucial to avoid repeating past mistakes of continuous low-density growth, which has adverse environmental impacts. Embracing a sustainable approach to growth is paramount.

2. **Understand our changing demographics.**
   The demographics and housing needs of our communities are evolving. To ensure efficiency and occupancy rates, we need a responsive housing strategy that fosters vibrant living communities while addressing affordability challenges.

3. **Unlocking land value to stimulate investment.**
   Encouraging 'missing middle' housing types can unlock greater land values, offering private industry incentives to invest in and deliver these diverse housing options. Supporting a market lead supply.

4. **Housing affordability as a mutual responsibility.**
   With compounding concerns around the cost of living, housing affordability serves as a crucial consideration in urban planning and policymaking. It ensures that housing is accessible and affordable for a broad range of income levels within our region. It is a mutual responsibility with the public and private sector working in collaboration. Care needs to be taken to ensure affordable housing policies are enabling rather than putting further constraints on land that is already challenging to bring to market.

5. **Providing housing choice.**
   Choice is a key enabler in providing people with the right form of housing throughout different life stages. The 'missing middle' concept is vital because it enables the introduction of new housing types into well-established, well-serviced neighbourhood, fostering greater diversity in sought-after locations and offering housing options at a more affordable price point compared to the predominantly available housing stock.

Supports a balance of housing across all subregions and markets.

Our members include a range of development interests, from infill development to large scale development on the fringe. Recognizing this diversity, The Property Council places great importance on ensuring a well-balanced land supply throughout Greater Adelaide, thereby facilitating a myriad of lifestyle options for our community.

We advocate for a future urban form that incorporates a variety of development types, encompassing small-scale infill, strategic infill, expansion within the CBD around vital transit hubs, and greenfield growth on the periphery of existing urban areas.

Key points

1. **Sub-regional growth targets that support housing diversity.**
   Growth targets should be based on sub-regions, rather than the whole GARP area and include the full range of development typologies to provide residents with greater choice.

2. **Flexibility of land supply planning.**
   GARP should provide flexibility for development types to be responsive and adaptive to changes in market-driven demands.

Promote strategic infill development and renewal around existing mass transit and local community hubs.

Unlocking strategic infill sites will play a crucial role in ensuring that new developments align with affordability and sustainability objectives, all while addressing the evolving needs of our expanding community.

As identified within the plan, significant strategic infill sites at Lightsview, St Clair, West Lakes, Dock One and Glenside have integrated successfully with existing neighbourhoods. These master planned communities provide high amenity for residents in well located areas.

The Property Council endorses the necessity for additional sites like these throughout Adelaide.

Key Points

1. **Promote strategic infill growth.**
   Our members support strategic infill sites around the Adelaide core as an ideal scenario for implementing the 'missing middle' approach through mixed use typologies. These sites can be strategically developed to enhance the city's liveability. However, care needs to be taken in creating further barriers to such development e.g., increased parking rates, lowered building heights due to community resistance, site contamination requirements and other policy barriers.

DTI:PlanSA Submissions

From: Prospect Residents Association <[redacted]>
Sent: Thursday, 2 November 2023 10:18 PM
To: DTI:PlanSA Submissions
Subject: Submission Greater Adelaide Regional Plan Discussion Paper
Attachments: Submission re GARG report.pdf

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Please find attached the Prospect Residents Association on the Greater Adelaide Regional Plan Discussion Paper.

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25 Oct 2023

Prospect Residents Association comments on the

THE GREATER ADELAIDE REGIONAL PLAN

General comments

The Prospect Residents Association supports the concepts put forward by the National Trust 50-year plan for metropolitan Adelaide in 2021 written by Professor Norman Etherington. This plan talks about using the rail network for planning for future population expansion or even population shrinkage concentrating around the rail network rather than around major roads. The basis of this plan is that rail networks have a greater capacity to transport a greater number of people at greater speed thus easing congestion on our roads and with less pollution now that the rail networks have been electrified. It also avoids destroying our historic and character inner suburbs and avoids haphazard development as has been currently occurring with over development in many inappropriate sites. It would require a change of focus by the State Planning Commission and the State government over the next 50 years. Those of us already experiencing the horrors of infill development are already caught up in terrible loss of amenity often in narrow streets that do not have the capacity to take the infill development.

We are in agreement with the City of Prospect Council report that this report focuses on housing growth without considering the impact of climate change, the circular economy and other broader issues eg developers taking advantage of a loose planning system with poor to no consequences for breeches of planning approvals and sloppy builds.

We also agree with the City of Prospect Council that we do not support a historic conservation zone/ heritage area on Fitzroy Tce Prospect being rezoned as Urban corridor. This would completely destroy this area of heritage in Prospect.

We do not support the Collinswood activity centre being rezoned urban corridor. This small shopping centre supports living locally but is surrounded by infill development with streets already struggling with too much traffic and parking with all the down side of infill in full force. (see the topic **The negative side of Infill development**). When development applications are

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made for infill in the inner suburbs there needs to be much better assessment of capacity of narrow streets for traffic and parking to relieve stress and safety issues. People are not going to give up their cars and stop visiting family and friends so car use needs much better planning and assessment.

Who to blame for the current housing crisis.

Currently it seems the people to blame for the housing crisis are single people in housing and couples without children.

This is completely fallacious. It is our view that the housing crisis has arisen from long term government's lack of planning and financial support for social housing and developers disinterest in building affordable housing. The developer's disinterest in affordable housing can be seen from the number of multi-storey buildings that have not included the percentage of affordable apartments that they have been required to include. In addition the lack of government funding to the various forms of Housing SA resulting in housing has been sold off and not replaced. This has been compounded by the lack of consequences to the development industry for not complying with this requirement. The lack of consequences for noncomplying development needs to change.

The lack of funding to Housing SA has probably been the single biggest reduction in social housing. Giving some money to Community housing has not made up for the short fall now in existence.

The housing crisis has been compounded by the introduction of Air B&B's where rental properties have been taken off the market and allowed to charge what they like to customers and make significant profits. This has been allowed to flourish with no thought about whether this is being managed properly by government policy or whether in fact this is a commercial enterprise in our residential streets.

This has been further exacerbated by foreign investors buying into the residential markets and inflating the cost of housing for South Australian residents. Foreign investment like this should be banned.

The negative side of infill development

The negative side of infill development includes

- People are put off walking from the state of footpaths and the clutter from having

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cyclists and scooters on footpaths.

- Increasing noise and compatibility issues as young people are thrust next to older and old and sick people and wanting to play loud thumping music, drink and take drugs just meters from a large number of households who experience significant stress and mental anguish from this lack of consideration.
- Congestion in streets from increased speeding traffic, to constant parking issues, to residents struggling to get out of their drives, due to out of date parking regulations creating these problems of congestion with parking and lack of parking spaces on streets.
- Increased neighbourhood conflict and aggression as a result of the problems listed.
- Unrealistic expectations that people will give up their cars and not want to visit friends and family and will develop friendships with people just because they live near them with whom they often have little in common.
- Poor public transport, removal of bus stations, inconsistent transport services.
- Over taxing on old street infrastructure such that the sewerage system blocks or power failures increase as transformers struggle to boost power flows.
- Increased wear and tear on roads creating pot holes due to increase in traffic flows down narrow streets.
- Constantly changing neighbours with Air B&B and rental properties.
- Loss of privacy and quiet times.
- Significant loss of trees and vegetation and the creation of streets with an increase in the heat bank affect which is exacerbated by people being allowed to build entirely unsuitable housing in these streets eg black brick housing and housing with dark roofs and cheap unsustainable housing.

What concerns us about the current report out for consultation.

1. It focuses on the road network rather than the rail network. The rail network has a much greater potential to get cars off the road and reduce congestion. The rail network, if utilized and developed strategically, has the potential to move people quickly as road crossings are reduced and hold ups removed. It has the potential to transport people over long distances. The potential here is a reduction of noise and petrol pollution as trains are electrified.

   We agree with the National Trust 50-year plan that the government should be buying up old industrial sites along the rail net work and looking into how to utilize and develop this

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potentially superior form of travel. These sites would be more able to be developed n as greenfield sites where climate change, sustainability of build, plus open space and recreational areas could be included.

2. We have significant concerns with the future plan to build on more of our agricultural land and believe this to be a very dangerous plan. If food is not grown locally then transport costs increase or we have to rely on imported food with more concern about the irradiation of our food supply. This affects cost, quality and health.

3. The main concern with greenfield sites is when the infrastructure is not managed well or left to last. Greenfields sites are better able to be master planned but need to take into account more sustainable development and not be allowed to use products that contribute to the heat bank affect and climate change e.g. black or dark brick and dark roofs. They can also be designed to help the focus of living locally when transport is well developed close to where they live eg if along the railway network.

4. The main drawback with the development of greenfield sites is when the developer develops the plan, it is given the tick and flick and then the developer does not follow the approved plan and leaves aspects out eg infrastructure or greening. There needs to be greater control around these plans to stop shoddy developments as can be seen on the Prospect urban corridors, at Mount Barker where roads don't meet or where suburbs are difficult to get in and out of, where housing is too close and there is lack of greening and bushfire concerns.

5. **Where is the next generation of strategic infill sites**

   Along the railway line with plans to improve and increase places serviced by trains. Linear development instead of radial development of Adelaide.

6. **What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbour, Goolwa and Rosewater?**

   The most important issues to consider if you want to grow these satellite cities is how to link them into the rail network and how not to build on our agricultural land.

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With Murray Bridge you must make sure any decision supports the work on regreening Frahns Farm by Bio-R which is working to replant lost vegetation to avoid major extinction of significant bird populations.

Perhaps these locations being semi-rural could find land/sites for tiny houses. More people are interested in tiny houses and granny flats which is more affordable but often require land around them to make them work ie the ability to be able to spill out into the open from small spaces.

7. **How can infill development achieve an urban form that is consistent with the principles of living locally?**
    - Better planning
    - Better greening
    - More quiet open spaces
    - Developers need to be held to account. Council needs to be able to issue **significant** fines for developers who breech the conditions of their approval given it is so expensive to take them to court and councils often do not have the money to do this.
    - Developers **must** adhere to the rules rather than **should.** Rules are too rubbery and developers should not be able to breech height limits and continually go back for variations to plans.
    - Better consideration of disability issues.
    - Protection of character homes and historic places
    - No permission to demolish homes until a plan for the rebuild has been approved.
    - Not cramming too many houses together so the problems occur as described in topic the **Negative Side of infill development** on page 2 of this report.

8. **What do you see as the benefits and potential drawbacks of infill development?**

Those of us living in residential streets with infill developments do not experience many if any benefits. You need to talk to the people living in infill on main roads to find out what they see as the benefits.

Unless you manage some of the key issues that occur with infill development in inner city locations you will continue to damage support for it. For example, when residents who pay rates lose the ability to

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safely access their driveways because streets are clogged with parking and traffic issues, and renters for example, park too close to driveways blocking access to driveways infill will not be supported.

Anyway, we feel that it is more important to focus infill on the rail network to get better transport outcomes and reduce congestion and car use on main roads and freeways.

9. **What are the most important factors for the commission to consider in meeting future demand for open space?**
    - Stop building on the parklands and support Lights special vision for Adelaide.
    - Stop cluttering our open space and make sure there are quiet reflective open spaces.
    - Stop allowing so many trees to be destroyed. Developers need to be held to account for the unnecessary destruction of trees.

The following gives an outline of what we support by quoting key aspects from the National Trust report/50 year plan.

In a warming world there must be no new developments in sites threatened by rising seas, fires or Flood.[1]

A professor of History at the University of Adelaide, Hugh Stretton thought planners had gone too far in copying the American radial city model which made practically everyone rely on cars for daily transport.....He was deeply impressed by the alternative model of the linear city espoused by Europeans at the turn of the 20th century. A city with significant centres dispersed along a high-capacity transportation line would allow every citizen to live within easy reach of employment, recreation, community services and open space.[2]

Adelaide's urban rail network is an extraordinary legacy from a previous era of economic growth. It is a grossly under-appreciated asset.[3] It should never be privatized.

How we make use of that asset depends a lot on the size of the population it serves. That has been the subject of fierce debate.[4]

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[1] A 50-year plan for Metropolitan Adelaide Prof Norman Etherington AM 2021 p 7
[2] Ibid, p 12
[3] Ibid, p 13
[4] Ibid, p 13

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The high growth model poses the biggest challenges to liveability, planning and infrastructure.[5]

The National Trust report poses the question "what if the growth does not happen and the metropolitan population remains static or gradually declines?[6]

A 50-year plan needs to be more than wishful thinking. It has to deal with all three possibilities: high growth, no growth and shrinkage.[7]

Apart from some impressive redevelopment of the old gas works and Clipsal factories at Bowden, astonishingly little has been done to realise the potential of the rail and tramway network which is enormous. Sydney anticipates that within a few years the residential density at green park on the rail to Mascot Airport will exceed that of Manhattan and Hong Kong[8]

That means concentrating all high density new residential building within easy walking distance of train and tram stations.[9]

Private developers will always seek to plant their towers in established neighbourhoods with high property values, tree-lined streets and handsome old buildings..... Those possibilities must be closed off. A government authority must guide the development of the linear city, not by mindlessly auctioning land to the highest bidder, but by acquiring derelict industrial sites and holding them expressly for the purpose of high-density housing set amidst attractive parks and gardens.[10]

In other Australian cities proximity to good public transport raises property values.[11]

Vested interests often argue that the only way to deal with increased population without intruding into surrounding agricultural land is by scattering higher density development through existing suburbs.... urban consolidation..... The pitfalls of the (this) policy were comprehensively detailed by Patrick Troys 1996 book, *The Perils of Urban Consolidation.*[12]

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[5] Ibid, p 14
[6] Ibid, p 14
[7] Ibid, p 14
[8] Ibid, p 16
[9] Ibid, p 16
[10] Ibid, p 16
[11] Ibid, p 16
[12] Ibid, p 17

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Relaxation of planning controls in the city centre and adjacent suburbs (has) delivered none of the proposed benefits. Developers, it turned out, did not want (have not wanted) to increase population density of affordable housing through medium and high rise building..... They want (ed) to build very expensive large apartments and units for cashed up buyers who coveted the lifestyle of the wealthier suburbs.... The specious arguments of the urban consolidators threatened to bulldoze irreplaceable heritage of colonial and federation domestic architecture for no good reason. (This is currently happening at an alarming rate)

The reimagined linear city – intensive development on former industrial sites served by road and rail – is the means by which a greatly increased population can be achieved without needlessly destroying established neighbourhoods of historic charm.[13]

Without rapid transport, most of these suburbs (middle and outer) will remain car dependent (even if the cars are not personally owned or driven).[14]

No growth

Building a land bank of state-owned former industrial sites buys insurance against any unexpected developments. If growth stands still the land can be gradually released for medium density housing around stations interspersed with attractive parks and recreational facilities. [15]

Shrinkage

Examples around the globe demonstrate that shrinkage happens. At National level Italy and Japan and other developed countries will lose people over the next fifty years.[16]

The city of Leipzig in Germany provides an example of how good planning can manage decline.

Adelaide escaped the disasters that afflicted Leipzig, but can take lessons from the Germans on how to manage a stable or shrinking population. There is much to gain from deciding what to keep, what to throw out and what to renew.[17]

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[13] Ibid, p 17
[14] Ibid, p 17
[15] Ibid, p 18
[16] Ibid, p 18

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The greater the likelihood of population decline, the greater is the necessity for historic conservation.

When population shrinks planning rules can provide more certainly for citizens, owners and developers. Great cities such as Paris and Amsterdam have shown how setting rules and sticking to them can create urban beauty that grows with every passing generation.[18] As we have seen, in both high growth and low-growth scenarios, the rail lines remain what Hugh Stretton perceived them to be in 1970 – the best hope for housing large numbers of people in close reach of essential services, entertainment and open space.[19]

Because we cannot know precisely how the city will develop over the next fifty years, we must hang onto all our irreplaceable assets.

[redacted]

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[17] Ibid, p 19
[18] Ibid, p 19
[19] Ibid, p 20g

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From: Cathy Cochrane [redacted]
Sent: Monday, 6 November 2023 4:38 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: JFA Purple Orange Submission State Planning Commission Greater Adelaide Regional Plan.pdf

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Good afternoon
I sincerely apologise if you also received this via the website form, however it appeared to time out, so to be safe I'm emailing a copy as well.
Many thanks!
Kind regards
Cathy

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Submission to the State Planning Commission about the Greater Adelaide Regional Plan

6 November 2023

About the Submitter

JFA Purple Orange is an independent social-profit organisation that undertakes systemic policy analysis and advocacy across a range of issues affecting people living with disability and their families.

Our work is characterised by co-design and co-production and includes hosting a number of user-led initiatives.

Much of our work involves connecting people living with disability to good information and to each other. We also work extensively in multi-stakeholder consultation and collaboration, especially about policy and practice that helps ensure people living with disability are welcomed as valued members of the mainstream community.

Our work is informed by a model called *Citizenhood*.

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Contents

1. Summary and recommendations 5

2. Introduction 10

2.1. Model of Citizenhood Support 12

2.2. Outcomes to guide how Greater Adelaide should grow 13

2.3. Principles to guide where Greater Adelaide should grow 16

2.4. Co-designing the GARP and its implementation 18

2.5. Setting priorities and tracking progress 19

2.6. Note on language use 20

3. Focusing on housing outcomes that work for all people 21

3.1. Providing genuine housing choice and a place to call *home* 21

3.2. Increasing supply of accessible dwellings 23

3.3. Implementing the NCC Livable Housing Design Standard 25

3.4. Promoting Livable Housing Design beyond the NCC 27

3.5. Implementing an Accessible Housing Overlay in South Australia 28

4. Building inclusive neighbourhoods and communities 31

4.1. Changing negative attitudes and creating connections 32

4.2. Facilitating natural safeguards 34

4.3. Initiatives to promote neighbourliness and a sense of belonging 35

5. Prioritising accessible communities 37

5.1. Planning for accessible communities 38

5.2. Investing in community infrastructure that is accessible for all 39

5.2.1. Transport infrastructure 40

5.2.2. Education infrastructure 42

5.2.3. Health infrastructure 43

5.2.4. Changing Places 44
5.3. Creating a public realm that includes everyone 45
5.4. Making emergency infrastructure accessible 46
5.5. Providing accurate information about accessibility 47
6. Conclusion 49
7. Appendix A – Draft Accessible Housing Overlay Code Amendment (SA Planning and Design Code) 50

1. Summary and recommendations

The Greater Adelaide Regional Plan (GARP) is an important opportunity to shape a future that ensures all people have access to an accessible, affordable, and safe place to call home situated within a community that is welcoming, inclusive, and accessible to everyone. Diversity is a great strength of our communities, and it is essential we take every possible step to ensure everyone can participate equally in the social, cultural, and economic life of our society. This cannot be taken for granted; it requires proactive planning and intentional actions to ensure our neighbourhoods and communities are designed to maximise inclusion and opportunities for each person to take up active valued roles in their community. The GARP must set outcomes and targets to increase the supply of accessible housing and to only invest in community infrastructure that is inclusive and accessible for everyone. The GARP should also identify existing gaps in outcomes and commit to priority actions to overcome these. To ensure there is ongoing accountability for change, five-yearly independent evaluations should occur and be publicly reported.

We recommend:

Recommendation 1: The Greater Adelaide Regional Plan (GARP) should draw on the Model of Citizenhood Support in articulating a new vision for how the Greater Adelaide community grows and evolves over the next 30 years, and as a useful lens through which to grapple with the range of complex issues the plan must address.

Recommendation 2: The Greater Adelaide Regional Plan (GARP) should identify existing unmet needs within the Greater Adelaide region and articulate targeted actions and investments to address these within the formulation of how the Greater Adelaide region should grow. A framework that identifies a set of priorities to fix existing gaps should be considered alongside generalised outcomes.

Recommendation 3: The Greater Adelaide Regional Plan (GARP) should recognise people living with disability as valuable and equal members of Greater Adelaide region communities and reflect and promote the Social Model of Disability.

Recommendation 4: The Greater Adelaide Regional Plan (GARP) should recognise Australia's obligations under the United Nations Convention on the Rights of Persons with

Disabilities (UNCRPD), among other human rights obligations, and ensure these rights are upheld and promoted.

Recommendation 5: The Greater Adelaide Regional Plan (GARP) should align with *Australia's Disability Strategy 2021-2031* and the South Australian State Disability Inclusion Plan, known as *Inclusive SA*, and work in a complementary manner to fulfil all the commitments therein.

Recommendation 6: The Greater Adelaide Regional Plan (GARP) should identify gaps in processes and barriers for planning and implementation regarding how to ensure growth locations are inclusive of, and accessible to, all members of the Greater Adelaide region community. This should be central to the formulation of principles to guide where Greater Adelaide should grow. A framework that identifies a set of priorities to fix existing shortcomings should be considered alongside generalised outcomes.

Recommendation 7: The State Planning Commission should ensure it undertakes a genuine co-design process to design and implement the Greater Adelaide Regional Plan (GARP). It should engage with a range of cohorts, including people living with disability, to ensure the plan reflects diverse needs and will be fit-for-purpose to ensure it delivers what communities need over the next 30 years.

Recommendation 8: The State Planning Commission should conduct further open public consultation on the draft Greater Adelaide Regional Plan (GARP) once it is formulated.

Recommendation 9: The Greater Adelaide Regional Plan (GARP) should set out meaningful, timebound, and measurable targets to ensure there is accountability for delivering on its commitments. An independent evaluation of progress toward outcomes should occur every five years with the results publicly reported.

Recommendation 10: The Greater Adelaide Regional Plan (GARP) should articulate a vision whereby all people have access to a place they can authentically call *home*. It should underscore that this principle applies equally to all people living with disability, not just non-disabled people.

Recommendation 11: The Greater Adelaide Regional Plan (GARP) should include an outcome regarding housing choice for everyone and priority actions to address the existing absence of choice for many people living with disability.

Recommendation 12: The Greater Adelaide Regional Plan (GARP) should include an outcome and associated targets to increase the supply of accessible dwellings in the region, including for both private market and social housing.

Recommendation 13: The Greater Adelaide Regional Plan (GARP) should include a target that measures the number of dwellings built that fully comply with the National Construction Code (NCC) 2022 Livable Housing Design (LHD) Standard, those that partially comply due to an exemption, or those that do not comply at all as a result of 'blanket' exemptions, including for both private market and social housing. This will enable better monitoring of supply, help identify any issues encountered in the implementation, and ensure the housing industry and governments are accountable for delivering genuine change.

Recommendation 14: The Greater Adelaide Regional Plan (GARP) should include a target that all dwellings are built to high level accessibility standards within 20 years. To support this outcome, it should promote the benefits of accessibility and include a target to measure the number of dwellings built to levels of accessibility that exceed mandatory compliance, for both private market and social housing.

Recommendation 15: The Greater Adelaide Regional Plan (GARP) should commit the State Planning Commission to undertaking a Planning and Design Code Amendment to create an Accessible Housing Overlay as soon as possible (for example, see Appendix A).

Recommendation 16: The Greater Adelaide Regional Plan (GARP) should commit the State Planning Commission to undertaking a review of all planning rules and regulations and how they impede the goal of increasing the supply of accessible livable housing in the Greater Adelaide region.

Recommendation 17: The Greater Adelaide Regional Plan (GARP) should clearly define the characteristics of the style of neighbourhoods it seeks to build and identify the key elements of planning, design, and construction that will produce this outcome. It should

focus on how Greater Adelaide grows in ways that create and enhance inclusion, connectedness, neighbourliness, and a genuine sense of welcome.

Recommendation 18: The Greater Adelaide Regional Plan (GARP) should recognise the impact of negative attitudes, stigma, and stereotypes for people living with disability and include actions to breakdown these barriers, including by addressing the need to plan, design, and develop in ways that will facilitate interactions and connections between people in neighbourhoods.

Recommendation 19: The Greater Adelaide Regional Plan (GARP) should recognise and reinforce the important role neighbourhoods and communities that are planned, designed, and built for inclusion and connection can play in creating mutual natural safeguards between people, especially those experiencing isolation and disconnection.

Recommendation 20: The Greater Adelaide Regional Plan (GARP) should include actions and outcomes regarding funding small seed grants or similar for local grassroots projects in support of inclusive connected neighbourhoods and communities.

Recommendation 21: The Greater Adelaide Regional Plan (GARP) should elevate the essential role of community places and spaces in addition to land for houses and jobs. Community places and spaces should be part of every development plan and design for where Greater Adelaide should grow.

Recommendation 22: The Greater Adelaide Regional Plan (GARP) should emphasise the impact of every step of the planning process on final outcomes and ensure that planning for accessibility is a priority action under the plan.

Recommendation 23: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets that ensure all investment is directed to community infrastructure that is genuinely accessible to, and inclusive of, everyone. It should explicitly rule out investment in segregated provisions in any form.

Recommendation 24: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets for the accessibility of public transport services and infrastructure across Greater Adelaide. It should also identify priority actions to fix existing gaps through a comprehensive audit that sets a baseline for progress.

Recommendation 25: The Greater Adelaide Regional Plan (GARP) should endorse the provision of Inclusive Education in all schools and specifically rule out the establishment of new segregated education provisions anywhere in the Greater Adelaide region effective immediately. This must preclude any new 'special' schools, units, programs, or similar.

Recommendation 26: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets for the accessibility of health infrastructure across Greater Adelaide.

Recommendation 27: The Greater Adelaide Regional Plan (GARP) should promote the roll out of Changing Places facilities and include a measure to track progress.

Recommendation 28: The Greater Adelaide Regional Plan (GARP) should adopt an expansive vision of the public realm and recognise the critical importance of making green spaces accessible to everyone.

Recommendation 29: The Greater Adelaide Regional Plan (GARP) should make accessible emergency infrastructure, procedures, and information provision a top priority and include an outcome and targets to achieve this.

Recommendation 30: The Greater Adelaide Regional Plan (GARP) should commit to an action that requires the co-designing and implementation of a simple framework, definitions, and standards for the provision of information about the accessibility status of places and spaces that can be used by governments, businesses, organisations, and others to communicate clear consistent information to the public.

2. Introduction

JFA Purple Orange is grateful for the opportunity to provide this submission to the State Planning Commission regarding the development of the Greater Adelaide Regional Plan (GARP).

We welcome the opportunity to apply a long-term lens to how the Greater Adelaide region should evolve to meet the needs of its growing and changing population over the next 30 years. The recognition of the importance of planning for the future to better address the myriad of problems the region faces – from climate change to the housing crisis – is fundamental to improving outcomes. Yet, while the consequences of many of these problems will be felt across the whole population, it is essential the disproportionate impacts on those with existing unmet needs and ongoing experiences of exclusion be prioritised in the GARP.

Many people living with disability continue to be excluded from full participation in community life in the Greater Adelaide region. There is a shortage of accessible housing available, and many are forced to live in shared arrangements, including in group houses,[1] without choice of where they live, who they live with, or who enters the property. The surrounding community amenities and social infrastructure are still inaccessible with poorly maintained footpaths, steps, and other physical barriers, preventing access to essential services and opportunities for social participation. The experience of living in a neighbourhood is often characterised by exclusion, disconnection, and isolation. Many of the experiences highlighted in the 2009 *Shut Out* report, including in the excerpt below, are unchanged after years of unkept promises and a lack of investment in change:

> *People with disabilities may be present in the community but most do not enjoy full participation in it. Discrimination and exclusion are frustrating features of daily life. People in wheelchairs cannot access the public facilities taken for granted by others in the community, such as playgrounds, swimming pools, cinemas, restaurants, hotels and cafes. Children with*

[1] In their character and effect, group houses are service facilities, not homes. This is why we deliberately use the term 'group houses' rather than the more common 'group homes'. The use of 'home' in this context is a misnomer and profoundly compromises its true meaning.

> *disabilities find themselves excluded from local kindergartens and schools... People with mobility aids have difficulty regularly accessing public transport. People with various disabilities are unable to access the aids, equipment and technology essential to their daily functioning, and are unable to access the support required to get them out of bed in the morning… People with disabilities feel forgotten.*[2]

It is a sobering reality. The task of driving change should not be left to people living with disability; it is everyone's responsibility. The GARP must play its part in setting out an agenda for change and identify relevant targets that will ensure accountability for delivering results.

The Discussion Paper for this consultation focuses on two key questions: how should Greater Adelaide grow and where should Greater Adelaide grow? Later in this introduction, we briefly respond to the proposed outcomes for how Greater Adelaide grows and the principles to guide where this occurs and highlight the gaps that we believe need to be addressed. We also emphasise the importance of co-design, both in formulating the GARP and in implementing it over the short, medium, and long term, as well as the crucial importance of tracking progress in line with clear interim milestones.

Then, in the following substantive parts of this submission, we focus on three critical topics that are largely overlooked in the Discussion Paper and its proposed outcomes and guiding principles: delivering housing outcomes that are accessible, affordable, and suitable for all members of the Greater Adelaide community; creating inclusive welcoming neighbourhoods and communities for the benefit of all; and ensuring communities are accessible to everyone. The recommendations provided throughout this submission are designed to make a constructive contribution to broadening the perspectives brought to the analysis of issues to be addressed in the GARP and to thereby strengthen the resulting plan to ensure it is as comprehensive, inclusive, and robust as possible.

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[2] Australian Government, 'Shut Out: The Experience of People with Disabilities and their Families in Australia', 2009, p.52, available at https://www.dss.gov.au/our-responsibilities/disability-and-carers/publications-articles/policy-research/shut-out-the-experience-of-people-with-disabilities-and-their-families-in-australia.

Our organisation's work is informed by a model called *Citizenhood*. We believe this model offers a valuable lens through which the Commission can consider all aspects of the GARP to ensure the resulting plan offers the best prospects of shaping an accessible, inclusive, sustainable, and prosperous future for the Greater Adelaide region. As such, the next section briefly introduces the Model of Citizenhood Support.[3] We encourage the Commission to access the full paper via our website.

2.1. Model of Citizenhood Support

The nature of our communities – from their design to their character to the atmosphere created – has significant implications for how people live and the availability of life chances. A good life for each person largely depends on the assets and opportunities available within their community. The Model of Citizenhood Support sets out a framework for how people can be supported to build their chances of a good life and maximise their *Citizenhood*. Secure appropriate housing, neighbourhoods that are inclusive and welcoming, and fully accessible community and social infrastructure are fundamental to a person's chance of living a good ordinary life and having meaningful valued roles in community life.

The Model provides a comprehensive contextual framework for organising policy and practice in support of people living with disability. Although it was developed with a focus on the life chances of people living with disability, it is also a highly relevant lens through which to approach policymaking regarding issues faced by other cohorts and, indeed, all aspects of the GARP. Hence, we urge the Commission to consider how this Model can usefully support its work.

The Model asserts that our life chances comprise four different, interrelated, types of assets we can call upon, termed the Four Capitals. These are: Personal Capital (how the person sees themself), Knowledge Capital (what the person knows and learns), Material Capital (money and the tangible things in our lives including a place to call home and access to community infrastructure), and Social Capital (having people in our lives whom we know and know us).

[3] R. Williams, 'Model of Citizenhood Support', 2nd edition, 2013, Julia Farr Association Inc, Unley, South Australia. See https://www.purpleorange.org.au/what-we-do/library-our-work/model-citizenhood-support.

These Capitals apply to any person and can reveal what types of investment and assistance might be helpful for someone to build a good life for themselves. It is worth noting that typically each of these assets is advanced when a person has access to safe, secure, accessible, affordable housing – and diminished significantly when a person experiences homelessness. Likewise, these assets are advanced by strong accessible communities that are inclusive and welcoming of all their members.

The concept of *Citizenhood* is not to be confused with the concept of Citizenship, which is a much narrower static construct typically referring to membership of a country.

Recommendation 1: The Greater Adelaide Regional Plan (GARP) should draw on the Model of Citizenhood Support in articulating a new vision for how the Greater Adelaide community grows and evolves over the next 30 years, and as a useful lens through which to grapple with the range of complex issues the plan must address.

2.2. Outcomes to guide how Greater Adelaide should grow

As noted above, the Discussion Paper raises two core questions. The first of these is how should Greater Adelaide grow? The Discussion Paper proposes the answer to this question be framed according to four desired outcomes to be achieved over the next 30 years. These are:

- A greener, wilder and climate resilient environment
- A more equitable and socially cohesive place
- A strong economy built on a smarter, cleaner, regenerative future
- A greater choice of housing in the right places

The themes identified in these statements are important although open to wide and varied interpretation. It seems fair to assume they identify where the intended emphasis lies even if it cannot be said they do not encompass other important objectives, such as accessibility and inclusion. Furthermore, this conceptualisation of generalised outcomes overlooks existing unmet needs within the Greater Adelaide community. Closing these gaps is likely to require targeted attention and investment, which may be better framed in the GARP as priorities for targeted actions and investments in addition to generalised outcome areas.

People living with disability currently have extensive unmet needs ranging from the shortage of suitable housing to the inaccessibility of most existing community infrastructure and their continued exclusion and segregation from community life, which are all largely absent from the Discussion Paper. We delve into each of these later in this submission. The Discussion Paper makes only one mention of 'disability' despite people living with disability making up 19.4 per cent of the South Australian population.[4] This oversight is reflective of how the experiences of people living with disability are often missed or disregarded in planning for our communities. Unfortunately, the one mention of 'disability' that is included in the Discussion Paper appears in relation to people living with disability being a group "facing 'deep and persistent' disadvantage,"[5] without providing any context, as if this can be taken as a given and applied to every person living with disability.

The Social Model of Disability recognises that disability results from the barriers, attitudes, and exclusion that people encounter as they navigate a society that has not been designed to include all its members. Importantly, people are not disabled by an impairment or difference, but by the world around them. It is essential the GARP reflects the Social Model of Disability and does not perpetuate outdated medical or charity approaches to disability that regard people as 'problems' to be fixed or unable to live meaningful contributing lives in communities. The process of deinstitutionalisation is still ongoing in Australia and the same is true in the Greater Adelaide region where many people are still subject to segregation, exclusion, and discrimination in all facets of life including housing, education, and employment. It is critically important that the GARP contributes positively to change and does not inadvertently advance the creation of a new generation of quasi-institutional discriminatory approaches, practices, and infrastructure designs.

Australia is a signatory to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), and it is important the GARP also reflects the obligations this bestows on all tiers of government.[6] The Discussion Paper only makes one reference to the rights of

[4] Australian Bureau of Statistics (ABS), 'Disability, Ageing and Carers, Australia: Summary of Findings', 24 October 2019, available at https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release.
[5] See page 60 of the Discussion Paper.
[6] See further at https://humanrights.gov.au/our-work/disability-rights/united-nations-convention-rights-persons-disabilities-uncrpd.

people within the Greater Adelaide region, and this relates narrowly to landowners' land use rights.[7] It is essential the GARP and, in implementing it, governments, apply a much broader lens regarding human rights and ensure the UNCRPD, among other human rights obligations, is upheld and promoted. The UNCRPD covers many facets of life that are highly relevant to the GARP including, but not limited to, equality and non-discrimination (Article 5), accessibility (Article 9), living independently and being included in the community (Article 19), access to information (Article 21), and community participation (Article 30).

Australia's Disability Strategy 2021-2031 aligns with the obligations of governments to protect, promote, and realise the human rights of people living with disability. South Australia has committed to achieving a range of outcomes under this Strategy and the GARP should also reflect and align with these. In particular, the Strategy commits governments to leadership for the inclusion of all people living with disability; accessible housing and genuine housing choice; accessible built and natural environments; and full participation in the social, recreational, and cultural life of communities. Similarly, the GARP needs to align with the South Australian State Disability Inclusion Plan, known as *Inclusive SA*, which is currently under review with an updated version to be adopted next year.

Recommendation 2: The Greater Adelaide Regional Plan (GARP) should identify existing unmet needs within the Greater Adelaide region and articulate targeted actions and investments to address these within the formulation of how the Greater Adelaide region should grow. A framework that identifies a set of priorities to fix existing gaps should be considered alongside generalised outcomes.

Recommendation 3: The Greater Adelaide Regional Plan (GARP) should recognise people living with disability as valuable and equal members of Greater Adelaide region communities and reflect and promote the Social Model of Disability.

Recommendation 4: The Greater Adelaide Regional Plan (GARP) should recognise Australia's obligations under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), among other human rights obligations, and ensure these rights are upheld and promoted.

[7] See page 103 of the Discussion Paper.

Recommendation 5: The Greater Adelaide Regional Plan (GARP) should align with *Australia's Disability Strategy 2021-2031* and the South Australian State Disability Inclusion Plan, known as *Inclusive SA*, and work in a complementary manner to fulfil all the commitments therein.

2.3. Principles to guide where Greater Adelaide should grow

The second core question raised in the Discussion Paper is where Greater Adelaide should grow in order to support a significant population increase over the next 30 years. The Paper proposes seven principles to guide decision making about where this growth is located. These are:

1. We will plan for a high-growth scenario and stage the release of new land to meet the forecast demand of 300,000 dwellings by 2051.
2. Sub-regions will have their own distinct part to play in Greater Adelaide's future and each Local Government Area will have targets to accommodate growth.
3. Land supply beyond the planned future urban lands must take into consideration existing capacity of land that is available for development within the existing boundaries (defined by EFPAs [that is, Environment and Food Production Areas]).
4. Planning will accommodate rolling 15-year land supply targets for a range of land supply types.
5. The encroachment of urban areas on places of high primary production, landscape or environmental significance should be avoided.
6. To account for zoned land that may not become available for development due to landowner intention, an additional amount of land supply will be identified.
7. Identification and prioritisation of growth areas will be based on the transparency of costs to community (infrastructure provision, housing cost, ongoing living costs, climate change resilience costs) for differing forms of supply.

The considerations identified in these principles are important, but we believe there are significant gaps in the emphasis, if not the intent, of these parameters to guide decision making. The locations of communities, and the associated assets and opportunities that are contingent on this, have serious implications for what life is like for residents. Therefore, the

inclusiveness and accessibility of the neighbourhoods and communities in which housing and employment are located is critically important. It requires proactive planning; different adaptable strategies depending on whether the development is occurring on a greenfield site, within an existing inner or outer suburb, in a satellite city, or in a town; and a strong commitment to invest in the required accessible infrastructure and amenities.

To date, the planning, strategies, and investment undertaken have often fallen short of achieving the necessary outcomes and, therefore, the GARP should identify what gaps in processes and barriers to implementation are present so addressing these can be prioritised. The GARP is an opportunity to reflect on what has worked before and what has not, and can be an avenue to share these learnings to ensure continuous improvement. It must proactively seek to avoid repeats of past mistakes, as well as be realistic rather than aspirational. Growth locations should not be identified on the basis of an aspiration for a piece of infrastructure, such as a train line extension to an outer location in the region, if the necessary resources to make that a reality are not also allocated. Aspirations that will never be delivered are the enemy of good planning.

A focus on planning, development strategies, and investment to identify the most appropriate locations for, and support the quality of development in, growth areas also lead us to the consideration of the three critical topics we have already identified above, to which we devote the substantive parts of this submission. These are the need to increase the supply of housing that is accessible, affordable, and suitable for all members of the Greater Adelaide community; focus on creating inclusive welcoming neighbourhoods and communities for the benefit of all, and ensure communities are accessible to everyone.

Recommendation 6: The Greater Adelaide Regional Plan (GARP) should identify gaps in processes and barriers for planning and implementation regarding how to ensure growth locations are inclusive of, and accessible to, all members of the Greater Adelaide region community. This should be central to the formulation of principles to guide where Greater Adelaide should grow. A framework that identifies a set of priorities to fix existing shortcomings should be considered alongside generalised outcomes.

2.4. Co-designing the GARP and its implementation

In this submission, we highlight some of the key elements that we believe are essential if the GARP is to achieve meaningful results. However, we do not regard this contribution as anything more than a first step. For the GARP to truly reflect the issues and concerns of the Greater Adelaide community and to benefit from their lived experiences, insights, and ideas, we strongly believe the Commission should implement a comprehensive co-design process that genuinely engages people in the development, decision-making processes, and implementation of the plan. The co-design process should be designed to involve diverse representation from across the community including people living with disability. While running a consultation to enable people to have a voice is important, a greater emphasis on active participation and leadership from within the Greater Adelaide community will produce a better result.

Indeed, governments and government agencies should proactively consider how genuine co-design processes can enhance policy development across all areas of their work. While we often hear of agencies stating they have used a co-design approach, we are concerned that many of the processes governments are currently referring to as co-design fall well short of best practice and do not include active involvement in decision making. We encourage the Commission to access our Guide to Co-Design with People Living with Disability, [8] which was itself co-designed, via our website.

Additionally, we expect that, once formulated, the draft GARP will be presented again for further open public consultation and input.

Recommendation 7: The State Planning Commission should ensure it undertakes a genuine co-design process to design and implement the Greater Adelaide Regional Plan (GARP). It should engage with a range of cohorts, including people living with disability, to ensure the plan reflects diverse needs and will be fit-for-purpose to ensure it delivers what communities need over the next 30 years.

[8] View the Guide at https://purpleorange.org.au/application/files/7416/2510/1861/PO-CoDesign_Guide-Web-Accessible.pdf.

Recommendation 8: The State Planning Commission should conduct further open public consultation on the draft Greater Adelaide Regional Plan (GARP) once it is formulated.

2.5. Setting priorities and tracking progress

It is essential the GARP includes targets that are meaningful, timebound, and measurable to ensure there is accountability for outcomes. We note this plan will replace one initially prepared in 2010 and subsequently updated in 2018. We fully support ongoing reflection and evolution. Yet, one obvious downside is how this undermines the evaluation of results. We will never know exactly what the 30-year plan created in 2010 achieved over a 30-year span because it will be replaced before even reaching the half-way point of this term. This is not to suggest we disregard the importance of planning for the long-term or thinking about what the Greater Adelaide region will be like in 30 years' time. Rather, it highlights the need to set regular interim targets and evaluate progress at various intervals throughout the implementation of the GARP.

We suggest the GARP should include targets that are timebound for each five-year period within the 30-year timespan. At each of these junctures, a comprehensive independent assessment of progress should be conducted with the results publicly reported. A comprehensive review of the GARP itself could be conducted on a 10-yearly basis, at which point the span of the document could be extended for a further 10 years. Such an approach would ensure continuity and accountability are core features of the GARP.

We recognise that many desirable outcomes may not be easily measured, particularly if the Commission focuses on quantitative rather than qualitative results. This is true of some of the topics we raise in this submission. Therefore, it is likely that a GARP-specific evaluation design and associated data collection will be necessary. Actions to achieve this should be set out in the GARP.

Recommendation 9: The Greater Adelaide Regional Plan (GARP) should set out meaningful, timebound, and measurable targets to ensure there is accountability for delivering on its commitments. An independent evaluation of progress toward outcomes should occur every five years with the results publicly reported.

2.6. Note on language use

Choice of language is impactful yet can be difficult to navigate especially when words have multiple meanings or are in common usage in particular contexts and therefore act as a shortcut to a message being easily understood. Language and word use is also constantly evolving and changing. Nevertheless, we can all be mindful of the words we choose to use, what they might mean to diverse groups in the community, and whether there is a more inclusive alternative. Unfortunately, there are some examples in the Discussion Paper that would be best avoided. For example, as noted above, assigning 'disadvantage' to whole groups of people can be easily avoided with more nuanced expression. The use of shortcut terms like 'walkable' to imply the nature of an area can also be avoided (together with ableist connotations) and instead use language that directly conveys the intended meaning and features of the location, such as an accessible 15-minute neighbourhood. 'Living Locally' seems to be intended to create a shortcut term that implies numerous features of a community within Greater Adelaide but is also vague and open to broad interpretation. We would urge the Commission to choose its words carefully and to use clear direct language that is accessible to all while avoiding 'buzzwords'.

3. Focusing on housing outcomes that work for all people

While the current housing crisis is impacting all Australians, the impact is far greater for people living with disability who need both accessible and affordable housing options. The availability of accessible housing is extremely limited in the Greater Adelaide region, and many people are forced to wait for long periods of time to find suitable accommodation. Outdated institutional approaches to disability housing persist and, indeed, continue to be favoured by government agencies, with many people living with disability forced to reside in group houses with people they do not know and would not choose to live with. Others are stuck in inappropriate accommodation, including in hospitals long after their clinical needs have been met, due to no suitable alternatives being available. It is critically important that addressing the poorer housing outcomes for people living with disability be at the forefront of the Commission's approach to developing the GARP.

Rather than providing feedback structured around the proposals put forward in the Discussion Paper, we have elected to dedicate the three substantive parts of this submission to the critical elements that we believe are overlooked, or received insufficient attention, in the Paper. The first of these is the imperative that the GARP focuses on delivering housing that is *accessible* to all members of the community. Importantly, this is not to detract from the goals of genuine housing choice and well-located dwellings as identified in the proposed outcomes, both of which we endorse and will elaborate on further throughout this submission. Instead, it is to place a critical emphasis on the current severe shortage of accessible dwellings that must be overcome if the other proposed outcomes of the GARP are to be fully realised and if the right to suitable housing is to be met.

3.1. Providing genuine housing choice and a place to call *home*

Housing is a critical form of personal Material Capital and a key element of advancing people into lives of *Citizenhood*. It provides the base from which we access and build all our other Capitals. A *home* is more than just a shelter; it should be a place we can genuinely call 'home'; a place of comfort, rest, renewal, and belonging; where we are free to be ourselves, personalise our surroundings, and make decisions about who enters and on what terms.

Home is the foundation that allows us to live good ordinary lives, pursue our goals and interests, do things that give us meaning and purpose, build and maintain relationships with friends and loved ones, connect with our neighbours, and actively participate in our local communities. It is where we find a sense of safety, security, and certainty when we return at the end of our day. Home enables choice and control in our lives; upholds our individuality, self-determination, and status; and facilitates the use of our existing skills and the development of new ones.

To invest in the chances of a house providing an authentic sense of home, the dwelling should be accessible in line with a person's individual requirements and close to ordinary community infrastructure, such as shops, healthcare services, transport hubs, recreation facilities, and other public amenities. The resident/s should be in charge of what happens in the home. Appropriate assistive technologies should be utilised to meet the occupant's circumstances and preferences, to maximise personal control. Crucially, a home should be a place where a person can welcome family, friends, and visitors and build ordinary valued relationships with their neighbours. When the above elements are accomplished, a person is much more likely to take up valued roles in community life and maximise their *Citizenhood*.

People living with disability still have less housing choice than other people despite steps toward deinstitutionalisation. While the Discussion Paper highlights the importance of housing choice, it does not recognise the unevenness in choices and outcomes that already exists. The GARP should recognise the difference between a house, a facility, and a *home* particularly for people living with disability. A goal of the GARP should be to ensure that each person lives in a place where they feel an authentic sense of *home*. It should articulate what it means to have a place to call home and the characteristics that help achieve this outcome. The *Model of Citizenhood Support* provides a useful lens through which to formulate this vision. The vision should encapsulate that home is personal to the individual and a base from which they can pursue all other parts of a happy, healthy, productive life in community. Such a vision is critically important to challenging and overcoming outdated perceptions that it is appropriate for people living with disability to be excluded from the ordinary housing options available to non-disabled people.

Recommendation 10: The Greater Adelaide Regional Plan (GARP) should articulate a vision whereby all people have access to a place they can authentically call *home*. It should underscore that this principle applies equally to all people living with disability, not just non-disabled people.

Recommendation 11: The Greater Adelaide Regional Plan (GARP) should include an outcome regarding housing choice for everyone and priority actions to address the existing absence of choice for many people living with disability.

3.2. Increasing supply of accessible dwellings

Greater Adelaide urgently needs more accessible housing. It is essential the housing market and social housing options cater to the needs of all people without discrimination, including those living with disability, older people, people using prams and other aids for young children, and the many others in the community who would benefit from greater accessibility. Good quality accessible housing should meet residents' current requirements, taking into account the possibilities of a short-term injury or other mobility restriction, as well as being easily adaptable to their changing needs into the future. The problems of affordability and housing security are significantly worse for those requiring accessible housing due to the even more severe supply shortage of such dwellings.

Many people living with disability are currently residing in unsuitable accommodation that they cannot move around in, or are stuck in hospital, residential aged care, or a group house, with no foreseeable solutions to improve their circumstances. Often, people living with disability have to make do with what they can get even if it is inaccessible in full or in part. Anecdotally, some people with physical disability have reported to JFA Purple Orange that they must crawl into their bathrooms or complete personal care routines in kitchens. Similarly, many people living with disability continue to live in family homes by necessity, not choice. Others are forced into shared living arrangements with strangers in disability group houses.

Getting by in unsuitable inaccessible housing has significant impacts on the lives of people with access needs. The 2020 study 'Lived experience and social, health and economic impacts

of accessible housing', conducted by the University of Melbourne's Dr Ilan Wiesel, highlighted the broad range of consequences of inaccessible housing.[9] Almost one third of respondents to the study's questionnaire indicated it had led to the loss of a job, a missed work opportunity, reduced work hours, or reduced productivity, while more than 80 per cent agreed or strongly agreed they cannot visit family or friends' homes due to inaccessibility.

It is important to dispel a common misunderstanding about housing for people living with disability: the National Disability Insurance Scheme (NDIS) does not provide housing support for the vast majority of participants. Just over 610,000 people have a personal NDIS plan, according to the National Disability Insurance Agency's (NDIA) quarterly report for April to June 2023. Of these, about 23,000 live in Specialist Disability Accommodation (SDA).[10] This leaves more than 96 per cent of NDIS participants – and millions more Australians living with disability – to navigate the mainstream housing market where the supply of accessible affordable dwellings is well below current demand. It is essential that the housing market and social housing options in Greater Adelaide cater to the needs of all residents, including those living with disability, without discrimination or segregation. To be clear, the NDIS does not, and was never intended to, fill this significant housing gap.

Our population is also rapidly ageing, with many people increasingly looking for housing options that allow them to 'age in place' and remain connected to their local communities. Institutional settings like nursing homes no longer meet the expectations of most people for their retirement and older years. Australian Bureau of Statistics (ABS) data indicates the portion of Australians aged 65 and older in 2020 was about 12 per cent.[11] By 2066, the ABS predicts that figure will be almost a quarter of Australia's population, including about 4.4 per cent likely to be aged over 85.[12] To accommodate this significant change, houses and apartments will need to be much more accessible than most existing stock. Houses and apartments built now are highly likely to still be in use well beyond 2066. Hence, there is an

[9] Ilan Wiesel, 'Lived experience and social, health and economic impacts of inaccessible housing', The University of Melbourne, 31 August 2020, available at https://disability.unimelb.edu.au/__data/assets/pdf_file/0011/3492686/RIA-Report-Survey-Findings.pdf.
[10] See National Disability Insurance Agency (NDIA), 'NDIS Quarterly report to disability ministers: Q4 2022-23', available at https://www.ndis.gov.au/about-us/publications/quarterly-reports.
[11] See Australian Institute of Health and Welfare (AIHW), 'Demographic profile', 28 June 2023, available at https://www.aihw.gov.au/reports/older-people/older-australians/contents/demographic-profile.
[12] *Ibid*.

urgent need to adopt accessible design standards in order to begin to futureproof residential dwellings. Otherwise, governments and individuals will face the exponentially higher costs of retrofitting accessibility features to these dwellings in the future.

Every person in Greater Adelaide is likely to benefit from housing that is accessible at some stage in their lives. Accessible housing is not just about people living with ambulant disability; it is about ageing in place, it is about young families, it is about anyone who has ever, or will ever, experience any form of temporary injury, it is for people who develop unexpected disease or illness, it is about people with someone with disability in their lives who wants to visit – it is about everyone. A change in life circumstances happens every day, sometimes it is for happier circumstances – like having a child – but for many it will be for more challenging circumstances, like a motor vehicle accident that causes injury, a medical event such as stroke, or being diagnosed with an illness such as Motor Neurone Disease (MND). When this happens, living in a house with basic accessibility features reduces the stress, cost, and hardship of that change. Struggles people face with changes in their lives, good or bad, and the costs associated with these changes, can be largely avoided through the implementation of basic accessibility features in housing design and construction.

Recommendation 12: The Greater Adelaide Regional Plan (GARP) should include an outcome and associated targets to increase the supply of accessible dwellings in the region, including for both private market and social housing.

3.3. Implementing the NCC Livable Housing Design Standard

JFA Purple Orange has welcomed the South Australian Government's commitment to implementing the new National Construction Code (NCC) 2022 Livable Housing Design (LHD) Standard (as well as the new energy requirements) in South Australia by October 2024. This is a crucial first step toward addressing the need for more accessible housing across our state and the nation, as well as future proofing housing stock for our rapidly ageing population. Adapted from the 'Silver' level requirements of the Livable Housing Design Guidelines of Livable Housing Australia (LHA), the NCC Standard will ensure that residential properties are easier to enter and navigate in and around, as well as allowing further adaptations to be made later to suit a resident. Examples of these basic requirements are at

least one entrance without a step, a ground level toilet, a hobless shower recess, and reinforced walls so grabrails can be added later if needed. Building in line with the 'Gold' level requirements of the Livable Housing Design Guidelines remains voluntary, but would deliver significant additional accessibility particularly in kitchens, living areas, and bedrooms, as we address further below.

As a member of the Ministerial Liaison Group Subcommittee, JFA Purple Orange has appreciated the opportunity to participate in conversations with the housing industry peaks about potential concessions to ensure they are sensible, necessary, and evidence based. It has been unfortunate that many discussions continue to circle back to proposing 'blanket' exemptions on all elements of the NCC LHD when a property may present with an evidence-based reason for a concession on one element of the LHD Standard. For example, if a step free entrance cannot meet the 1:14 maximum gradient from the footpath, garage, or car space then the stance taken by peak housing industry bodies has been for the house to be exempt from all LHD Standard elements, despite there being no evidence-based reason for the other elements not to be applied to the property. Just because a person might need assistance to enter a property does not mean they should not be able to use the bathroom independently while inside the home. Maximising accessibility means maximising independence.

Not only do blanket exemptions completely undermine the intention of the NCC LHD – which is to allow people to move around in their home with dignity throughout all stages of their lives – it will also create further stress for the housing construction industry into the future. This is especially the case with other jurisdictions across Australia moving to adopt the Standard, some well ahead of October 2024, and is the reason why many have been calling for a nationally consistent approach. Standardised products under the current requirements will become redundant requiring bespoke orders, while those that comply with the new rules will become the new standard items resulting in economies of scale that reduce their price. Therefore, any setback to the broad implementation of the new Standard, be it slow take up or excessive exemptions, will further inflate building costs, exacerbate supply shortages, delay builds, and result in more 'red tape' in compliance and materials sourcing.

It will take time for the implementation of the NCC LHD to incrementally expand the supply of accessible and safe accommodation for people living with disability, older people, others with mobility needs, and parents with children, among others, so time is of the essence. Therefore, it is essential the NCC LHD be embedded in the GARP and for there to be targets to ensure the roll out remains on track and new accessible dwellings are added to the housing stock in the region.

Recommendation 13: The Greater Adelaide Regional Plan (GARP) should include a target that measures the number of dwellings built that fully comply with the National Construction Code (NCC) 2022 Livable Housing Design (LHD) Standard, those that partially comply due to an exemption, or those that do not comply at all as a result of 'blanket' exemptions, including for both private market and social housing. This will enable better monitoring of supply, help identify any issues encountered in the implementation, and ensure the housing industry and governments are accountable for delivering genuine change.

3.4. Promoting Livable Housing Design beyond the NCC

The formulation of the GARP presents a valuable opportunity to drive increased adoption of accessible building designs throughout its term beyond what the formal adoption of the NCC LHD will, in its current form, achieve. There are a number of ways in which the GARP should promote best practice accessible design to meet the needs of residents with diverse access needs and our rapidly ageing population. First, the GARP should set an explicit target that all new dwellings are built to high level accessibility standards within 20 years. This should include a statement that all tiers of government continue to work to improve and expand the features included in the mandatory NCC requirements over time and actively participant in future review and updating processes conducted by the Australian Building Codes Board (ABCB).

Second, through the GARP, the Commission should work to promote the benefits of the NCC LHD and challenge mindsets based on maximising concessions and/or 'blanket' exemptions. Even if a property may technically be exempt from one or more elements, there will be many instances where some elements can be achieved, or innovative design would increase

accessibility even if this is not mandatory. Concessions and exemptions should only be used if absolutely necessary and are not themselves compulsory. The GARP can help support this attitude change whereby the dominant industry mindset becomes one to maximise accessibility rather than to take all possible steps to avoid it. The GARP should reiterate the importance of compliance and endorse best practice approaches to accessibility. It should address the fact that exemptions are designed to be an option of last resort where the practicalities of a build, such as an excessive slope, make it unavoidable. Further, it should counteract false claims that there is no point making the internal elements of a dwelling accessible if the entry standard cannot be met.

The third way that the GARP should promote accessibility beyond the NCC LHD is to highlight options for designs and builds that go beyond mandatory compliance. Although this is voluntary, it produces significant benefits. Examples include Livable Housing Design's 'Gold' level or adaptations thereof. While constructing houses to the NCC LHD will ensure dwellings are easier to enter and move around in, provide easier access to bathrooms, and allow for further adaptations to be made, such as installing rails, building to the 'Gold' level would deliver greater access in the kitchen, living areas, and bedrooms, among other aspects. The GARP should provide a list of resources that support the industry to go beyond mere compliance and voluntarily adopt best practices. The extent to which this is achieved should also be monitored across the Greater Adelaide region.

Recommendation 14: The Greater Adelaide Regional Plan (GARP) should include a target that all dwellings are built to high level accessibility standards within 20 years. To support this outcome, it should promote the benefits of accessibility and include a target to measure the number of dwellings built to levels of accessibility that exceed mandatory compliance, for both private market and social housing.

3.5. Implementing an Accessible Housing Overlay in South Australia

The South Australian Planning and Design Code includes an Affordable Housing Overlay, among many others. Its purpose is to address the shortage of affordable housing and to ensure affordable options are integrated in residential and mixed-use developments. This approach would also deliver significant benefits if it was adopted for accessible housing. Not

only would it increase the supply of accessible dwellings, but it would ensure integration that avoids the segregation, congregation, and 'ghetto-isation' of housing for specific cohorts and the consequences this causes, as outlined throughout this submission. It may involve developers partnering with specialist housing providers to build fully accessible houses (that is, to a higher level of accessibility than required by the NCC LHD) scattered throughout the neighbourhood with consideration given to proximity to bus stops, train stations, and similar services and amenities.

An Accessible Housing Overlay that is applied to new developments would align with South Australia's commitments under *Australia's Disability Strategy 2012-2031*, the State Disability Inclusion Plan, known as *Inclusive SA*, and *Our Housing Future 2020-2030*. We believe that the combination of overlays and early proactive planning in partnership with developers would generate significant additional community benefits especially from greenfield developments. We have taken the initiative to provide a draft of how an Accessible Housing Overlay could be formulated, which is provided in Appendix A of this submission.

For an Accessible Housing Overlay to achieve its greatest impact it is likely that broader planning and regulation issues also need to be resolved. For example, housing industry stakeholders often point to the narrowness of blocks or overall allotment sizes as a reason why accessible designs cannot be implemented. Yet, this does not deal with why the allotments are allowed to be set to such small dimensions in the first place, especially within greenfield developments. Further, excessively small blocks also have other consequences, including for car parking (noting many greenfield developments are not served by public transport), garbage and recycling collections, tree canopy, and general livability especially for families and children needing space to play. Therefore, we urge the Commission to commit in the GARP to a review of all planning rules and regulations and how they impact the capacity to increase the supply of accessible livable housing within the Greater Adelaide region.

Recommendation 15: The Greater Adelaide Regional Plan (GARP) should commit the State Planning Commission to undertaking a Planning and Design Code Amendment to create an Accessible Housing Overlay as soon as possible (for example, see Appendix A).

Recommendation 16: The Greater Adelaide Regional Plan (GARP) should commit the State Planning Commission to undertaking a review of all planning rules and regulations and how they impede the goal of increasing the supply of accessible livable housing in the Greater Adelaide region.

4. Building inclusive neighbourhoods and communities

Inclusive communities are where neighbourhoods are welcoming and inclusive of all their members, where social infrastructure is available and accessible to meet residents' needs, where kindness is extended to everyone, where social connections are made, and where natural safeguards emerge in people's lives. But too often people are excluded from their neighbourhoods. Some people may not be easily visible to others, perhaps because they rarely venture out. Or because they are receiving assistance from a support provider and leave the house escorted. Or because others notice support workers visiting a house so are less inclined to reach out or even chat over the fence. Where support professionals are obviously present, where houses resemble facilities, or where the physical environment creates a sense of seclusion, the neighbourhood rhythms created can result in people being disconnected. They are *in* the neighbourhood, but not *of* the neighbourhood.

The emergence of inclusive neighbourhoods and communities cannot be taken for granted. It takes deliberate intentional actions and investments based on strong pre-planning and good design. Unfortunately, in recent years some new greenfields developments resemble 'dormitory' suburbs; places where people sleep but do little else. They commute to other places for everything from work to shopping to recreation. Some may find social connection and a sense of community elsewhere, perhaps at a sporting club they commute to, while others are left isolated and disconnected within a 'community' that has little sense of welcome or neighbourliness on offer. Transport options are also likely to be very limited for those without private vehicles. Munno Para West is one obvious example of a recent 'dormitory' development. It is physically disconnected and some distance from Munno Para itself. It has nothing that resembles a neighbourhood hub, no cafes or shops where people gather, no school, only pockets of vegetation and small parks, and no open recreation space where people could be drawn together organically. New rows of houses are added as the development expands toward Munno Para Downs, with the same 'dormitory' style approach repeated.

The GARP should act as a circuit breaker on new 'dormitory' style developments and give focused attention to actions and investments that will ensure inclusiveness and neighbourliness become central features of all communities in the region. This is the second

critical element that is largely overlooked in the Discussion Paper and its importance is the focus of this part of our submission. Overarching terms like 'liveability' tend to influence thinking at a high level but fail to capture the essence of what strong inclusive communities need on the ground at a grassroots level. Hence, the GARP should provide clear guidance on what development conditions and design features provide the best foundations for the emergence of new inclusive, welcoming, and connected neighbourhoods, how the same can be encouraged, implemented, and sustained in existing communities where elements may already be present, and what can be done to 'retrofit' this to 'dormitory' style developments and suburbs.

Recommendation 17: The Greater Adelaide Regional Plan (GARP) should clearly define the characteristics of the style of neighbourhoods it seeks to build and identify the key elements of planning, design, and construction that will produce this outcome. It should focus on how Greater Adelaide grows in ways that create and enhance inclusion, connectedness, neighbourliness, and a genuine sense of welcome.

4.1. Changing negative attitudes and creating connections

An inclusive community benefits from the participation and contribution of all its members, bringing a diversity of voices, ideas, and perspectives into decision-making, activities and events, businesses, and general community life. It is this diversity that makes community life rich, interesting, and dynamic for the benefit of all. Despite improvements in recent years, negative attitudes towards various groups in our communities including people living with disability persist. Many non-disabled Australians do not regularly interact with people living with disability and have limited understanding of inclusion or the benefits of embracing diversity and all members of their community. Those who 'fit in' usually overlook the socially constructed norms that enable this while excluding and shaming others (even if unintentional).

The barriers faced by people living with disability are not the result of physical, intellectual, or psychological impairments, but stem from the way society is structured, functions, and perpetuates 'othering'. Exclusionary practices, such as segregated schooling, housing, transport, employment, and social programs are common and widely accepted as the norm,

but this must continue to change. An appreciation of diversity in all its forms needs to be woven into lives from an early age to facilitate the ways we think, feel, and act towards people living with disability.

Inclusive neighbourhoods create positive casual interactions between people living with disability and non-disabled members of the community, breaking down stereotypes and supporting meaningful connection. This is further harnessed by increased participation of people living with disability in mainstream education, employment, and community settings. It has implications for how we plan, design, and develop new communities in growth areas. Planners and designers need to give more attention to how and where residents will interact, get to know one another, and build connections, and ensure the elements that will facilitate this are present and planned for in all developments.

The approaches taken by those developing Intentional Communities are useful to informing how to plan and design for interaction and connection. These communities provide a mix of places and spaces that encourage incidental interaction, such as accessible walking paths, and more formal community hub-style places to facilitate connections and relationship building between people in communities. Often, these integrate environmental aspects to ensure greener sustainable communities, for example a community park with a pond that is also part of a stormwater management system or a community garden that utilises the residents' organic waste.

These communities are designed with intention to support the wellbeing of those who will live within them and prioritise the human need for connection and fellowship as a core part of the approach. They make it easy for the residents who will live there to connect with one another. We believe all developments should be planned and built with creating neighbourhoods at front of mind. The GARP should provide a set of guidelines or standards about how this is achieved to help facilitate this outcome.

Recommendation 18: The Greater Adelaide Regional Plan (GARP) should recognise the impact of negative attitudes, stigma, and stereotypes for people living with disability and include actions to breakdown these barriers, including by addressing the need to plan, design, and develop in ways that will facilitate interactions and connections between people in neighbourhoods.

4.2. Facilitating natural safeguards

The link between social isolation and loneliness and people's physical and mental health is not a new concept. Over the years many researchers have tackled the topic with similar conclusions – if people are excluded from society, the more prevalent loneliness and isolation becomes, particularly among some population groups like people living with disability, resulting in a decrease in people's physical and mental health. This places more strain on our already struggling healthcare systems and also reduces life expectancy. On the other hand, inclusive communities 'foster strong connections to people, place and nature. Such connections nourish people – physically, mentally, and spiritually – and provide a sense of wellbeing and belonging.'[13]

Freely given relationships are the greatest protections and natural safeguards for us all, including people living with disability. When people living with disability are separated, isolated, and disconnected from their community, this can lead to a life of exclusion and vulnerability to violence, abuse, neglect, or exploitation. The more inclusive communities and neighbourhoods are, the more likely it is that people living with disability will have informal support networks, which create natural safeguards.

Inclusive neighbourhoods pave the way for people living with disability to build informal social networks with neighbours and other members of their local community. This might be as simple as a person visiting the local library or a café weekly and becoming known by staff, or a person organising regular catch ups with neighbours, or attending the local community garden. These connections can serve as an important natural safeguard, as community members would notice and check in if the person was absent unexpectedly or for a significant period of time.

The tragic death of Ann Marie Smith in 2020 shocked South Australians and the nation. Ms Smith, who lived with Cerebal Palsy, died in hospital from septic shock, multiple organ failure, severe pressure sores, and malnourishment. Ms Smith was cut off from her neighbourhood and community with her only contact being her support worker, who has

[13] Lisa Stafford, Matt Novacevski, Rosie Pretorius, Pippa Rogers, 'What makes inclusive communities? Meanings, tensions, change needed', Planning Inclusive Communities Research Project Stage 1a report 3 MAR (2023) *University of Tasmania* 17.

since been jailed for manslaughter. Devastatingly, Ms Smith had very minimal community connections that could have given rise to concern over her health and welfare. The case highlighted the inadequacies of relying on formal safeguards like a complaints system. Instead, we must work toward creating and strengthening natural safeguards between people within neighbourhoods and communities and to support this through intentional planning and design.

Recommendation 19: The Greater Adelaide Regional Plan (GARP) should recognise and reinforce the important role neighbourhoods and communities that are planned, designed, and built for inclusion and connection can play in creating mutual natural safeguards between people, especially those experiencing isolation and disconnection.

4.3. Initiatives to promote neighbourliness and a sense of belonging

Inclusive neighbourhoods are characterised by the rhythms of neighbourliness and sense of mutual belonging. Sometimes this may emerge organically, usually as a result of the initiative and community spirit of one or a couple of proactive community members, but more often it requires deliberate and intentional actions at least to start something that can then grow. These initiatives are not expensive as they harness the community mindedness that already exists in communities. Usually, a small seed grant or investment is enough to set an activity or regular event up that will then be sustained by volunteer contributions and local momentum. Ultimately, these initiatives pay dividends far exceeding the original financial investment.

Sometimes the seed from which neighbourliness grows is a gathering place rather than activity or event. American urban sociologist Ray Oldenburg developed the notion of the 'third place': inclusively social places that are crucial for all people to live a healthy good life.[14] The 'third place' is not the home ('first place') or work setting ('second place') but exists within the community – at cafés, pubs, libraries, shops, playgrounds, churches, sports and recreation centres, and so forth. They are places where people from all walks of life

[14] See for example Ray Oldenburg and Karen Christensen, *Third Places: A Very VERY Short Introduction*, 2023, Berkshire Publishing Group.

come together equally. Concerningly, the Discussion Paper elevates the requirement for land for housing and jobs throughout, without mentioning these important community places.[15]

The nature of activities, events, places, and spaces for community connection will vary by location. People living in a seaside community will be drawn to the beach while for those living in a Hills community it is likely to be a park or natural setting. Therefore, it is important to avoid a one-size-fits all approach. Not only are these less likely to be sustained, but it is the uniqueness of each community that builds a sense of community pride, cohesion, shared interest, and positive energy. Funding should support ideas that come from within local communities at a grassroots level. It does not typically require a community development approach, but a relatively hands off support role that provides information to locals about how to go about creating an initiative and what resources are available that they can draw upon. It is local people taking local action. And it must not be disability-specific – it should be designed and implemented in ways that draw everyone in, including those who are harder to reach and engage due to greater social isolation.

Recommendation 20: The Greater Adelaide Regional Plan (GARP) should include actions and outcomes regarding funding small seed grants or similar for local grassroots projects in support of inclusive connected neighbourhoods and communities.

Recommendation 21: The Greater Adelaide Regional Plan (GARP) should elevate the essential role of community places and spaces in addition to land for houses and jobs. Community places and spaces should be part of every development plan and design for where Greater Adelaide should grow.

[15] See for example page 100 of the Discussion Paper.

5. Prioritising accessible communities

The inaccessibility of communities and social infrastructure continues to be a significant barrier to the full participation of many people in the community life of Greater Adelaide. These barriers prevent people accessing and using essential services and participating in the social, recreational, sporting, religious, and cultural life of their communities. It also prevents everyday social interactions and social connections, a topic we will focus on in the next part of this submission. Problems of inaccessibility particularly impact South Australians living with disability, but it is important to highlight that ensuring ease of access in all its forms benefits everyone. Again, we emphasise the critical importance of the GARP recognising and responding to the needs of our rapidly ageing population now or face significantly higher costs in the future.

Therefore, the third critical element that we believe the GARP must address is the accessibility of communities including, but not limited to, the built and natural environments and social and community infrastructure including public spaces and parks, transport, shopping and service precincts, and workplaces, to name but a few examples. While the Discussion Paper does pleasingly state 'every person, no matter where they live, should have access to transport, employment, healthcare, shops and services'[16], more specific detail is required regarding how these aspirations will be achieved for everyone's benefit, including people living with disability, older people, people with short-term injuries, parents with prams, delivery workers, and others with mobility needs. If the existing levels of inaccessibility are not adequately addressed, the GARP will not realise the proposed outcome of making the Greater Adelaide region a more equitable and socially cohesive place and the livability of communities will remain unacceptably poor especially for those living with disability.

As mentioned above, the GARP needs to align with *Australia's Disability Strategy 2021-2031* to ensure there is the policy and program consistency that will maximise outcomes. Unless accessibility is given greater priority in the GARP, the South Australian Government's commitments to improving accessibility in the Strategy will not be realised. All tiers of

[16] See page 59 of the Discussion Paper.

government in Australia have committed to making accessible communities a policy priority in order to deliver the important Strategy outcome: 'People with disability live in inclusive, *accessible* and well-designed homes and *communities*' [emphasis added]. Similarly, according to the South Australian Planning and Design Code[17], Master Planned Neighbourhood Zones also have the 'desired outcome' of creating: 'A new or expanding community with a diverse range of housing that supports a range of needs and lifestyles located within *easy reach* of a diversity of services, facilities and open space' [emphasis added]. It is essential that the GARP explicitly aligns with these obligations.

5.1. Planning for accessible communities

Making accessibility a top priority for all new developments, builds, renovations, upgrades, and replacements is the most effective and efficient approach to creating accessible communities. It avoids expensive repairs and retrofits later, as well as starting to reduce the cost and productivity burdens encountered everyday as people are forced to navigate accessibility barriers. Planning is critical to this proactive approach. As the Discussion Paper notes, the South Australia's planning system has an important role to play in tackling many pressing issues and we believe accessibility should be emphasised as a critical aspect of this.[18]

In our recent consultations with South Australians living with disability regarding the development of the National Housing and Homelessness Plan, participants told us more thought needs to be given to the location of housing so that people can live near essential community infrastructure and services, such as transport, healthcare, and shops. Participants noted accessible housing and SDA are increasingly located further away from these basic services, as well as community activities and events resulting in greater exclusion and isolation of people living with disability. The Discussion Paper, drawing on State Planning Policies (SPPs), suggests concentrating growth near existing social infrastructure. While we support this objective, we are concerned about how the SPPs seem

[17] PlanSA, 'Planning and Design Code', version 2023.9, 29 June 2023, pp.1442-1443, available at https://code.plan.sa.gov.au/__data/assets/pdf_file/0005/797684/Full_Code-29062023_Final.pdf.
[18] For example, at page 7 of the Discussion Paper.

to trade off maximising positive social outcomes with an emphasis on servicing communities through 'cost effective infrastructure'. Too often, infrastructure planning and construction prioritises cost-effectiveness while the economic and social benefits of providing genuinely accessible community infrastructure are not properly quantified.

The Greater Adelaide Regional Plan should recognise the need to plan for genuinely accessible communities. Housing for people living with disability should be spread throughout an accessible community and not congregated or segregated. It should also not create 'ghetto-isation' of public, community, and SDA communities. The many benefits of building accessible communities should provide the context for how green and brownfield developments are planned, designed, and constructed.

Recommendation 22: The Greater Adelaide Regional Plan (GARP) should emphasise the impact of every step of the planning process on final outcomes and ensure that planning for accessibility is a priority action under the plan.

5.2. Investing in community infrastructure that is accessible for all

The South Australian Government has this year made a series of announcements about new greenfield land releases, particularly in the northern and southern suburbs of Adelaide. The GARP contemplates a greater choice of housing in the right places, including small scale infill, redevelopment of brownfield sites, development along urban corridors, and greenfield growth on the edges of established urban areas. These developments present both opportunities and challenges. It is imperative the Government ensure that adequate infrastructure is put in place to support these new communities before residents begin to move in. Otherwise, communities are left without vital services, such as access to public transport, schools, amenities, and health services. It is also critical that community infrastructure adheres to the principles of Universal Design and ensures people living with disability, older people, people with prams, people with short-term injuries, and all others can easily move around, including via accessible footpaths, carparking, and building access points.

It is critically important that community and social infrastructure does not continue to perpetuate segregation of people living with disability. For far too long, society has perpetuated segregation in education, employment, housing, transport, and other community infrastructure and this creates barriers in both accessibility and attitudes. In their effects, these separate 'special' disability-focused facilities, services, and programs reinforce a community perception that people living with disability are best served by having separate 'special' things. This has been termed 'othering'. It kills true social, community, and economic participation and should have no place in our decision-making. The recent Final Report of the Royal Commission into Violence, Abuse, Neglect, and Exploitation of People with Disability has placed a spotlight on these unacceptable practices. Ordinary neighbourhood resources and opportunities available to all local people are a natural gateway to community membership. They bring meaningful valued roles readily available in our communities, often at low or no cost, into the lives of people living with disability. Assisting a person to connect to these resources and opportunities by ensuring communities are accessible can lead to a snowballing of connections and relationships for a person over time.

Recommendation 23: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets that ensure all investment is directed to community infrastructure that is genuinely accessible to, and inclusive of, everyone. It should explicitly rule out investment in segregated provisions in any form.

5.2.1. Transport infrastructure

Given that accessible transport is fundamental for many people, including people living with disability, to access essential services and participate in the social, cultural, and economic life of our communities, we believe the GARP should give focused attention to how this can be delivered across the Greater Adelaide region. Indeed, under Article 9 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), Australia is obligated to ensure that people living with disability can access transport services 'on an equal basis with others.' Furthermore, in *Australia's Disability Strategy 2021-2031*, federal, state, territory, and local governments have recognised the value of accessible transport services to both

individual and community lives and committed to the goal of ensuring that 'transport systems are accessible for the whole community' (priority number 5).[19]

This outcome is yet to materialise despite the Disability Standards for Accessible Public Transport 2002, known as the Transport Standards, having committed Australia to achieving fully accessible public transport and associated infrastructure by the end of 2022 (except for the train and tram conveyances, which had until 2032 to comply). JFA Purple Orange has had a longstanding interest in public transport in South Australia and has regularly engaged with the disability community on this topic over many years. In August 2019 and July 2022, we conducted transport surveys to understand how people living with disability use public transport services, the improvements that have occurred over time, and the barriers that continue to be present. Although survey respondents indicated there have been improvements since 2002, our July 2022 survey revealed that only 11 per cent of respondents rated the current accessibility levels of public transport as good or very good. This compares to 41 per cent who rated it as adequate, 38 per cent as poor, and 10 per cent as very poor.

We believe the GARP must highlight the inadequate rate of progress in achieving accessibility of public transport, particularly in relation to lowering reliance on private vehicles. It should commit governments to much-needed investment and genuine accountability and reporting mechanisms to ensure commitments and obligations are fulfilled. Further, we urge the Commission to undertake a comprehensive audit of shortcomings of all relevant transport options and infrastructure across the Greater Adelaide region as part of the process to develop the GARP. In particular, this audit should utilise the expertise of people living with disability who use this infrastructure. This will not only help drive change, but also set an important baseline against which outcomes from GARP can be measured in the years to come. This will be an essential element of ensuring that the new GARP succeeds where current approaches are failing.

Recommendation 24: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets for the accessibility of public transport services and infrastructure

[19] See *Australia's Disability Strategy 2021-2031*, available at https://www.disabilitygateway.gov.au/ads.

across Greater Adelaide. It should also identify priority actions to fix existing gaps through a comprehensive audit that sets a baseline for progress.

5.2.2. Education infrastructure

All South Australian children should have the option of attending their local school with the assurance of being welcomed, supported, and included, and thereby receiving a high-quality Inclusive Education. Sadly, for too many children and young people living with disability in South Australia, this is not the case. Yet, decades of research and evidence[20] tells us that Inclusive Education best prepares students living with disability for life and success. Research also demonstrates that non-disabled students greatly benefit from Inclusive Education. These benefits include a more positive sense of self, enhanced communication and language development, increased awareness of diversity, and a higher quality education that is better suited to individual needs. An environment should be designed to meet the needs of all people who wish to use it; this is a fundamental condition of good design.[21] When a building is accessible it allows everyone the ability to access and use it. Young people living with disability have a right to an education in the same way that other students do, and this right is supported if facilities are designed, planned, and built to give the best access, participation, and learning.[22]

It is extremely concerning that new schools to support areas of population growth, such as those at Aldinga and Angle Vale, are being established with separate Disability Units rather than implementing Inclusive Education models. All schools, especially new schools, should be accessible and inclusive of all people; this includes students, their parents and supporters, and staff. The GARP needs to clearly state that new special education provisions should not be built in the region. Otherwise, exclusionary habits will persist and will sustain

[20] For more information, see Inclusive School Communities project, 'Final Project Evaluation Report', October 2020, available at https://inclusiveschoolcommunities.org.au/news/final-project-evaluation-report.
[21] National Disability Authority Centre for Excellence in Universal Design (2014), What is universal design, http://universaldesign.ie/What-is-Universal-Design/
[22] Government of South Australia Department for Education and Child Development (2016), Effective Building Practices for Children and Students with Disability project report, https://www.education.sa.gov.au/sites/g/files/net691/f/effective-building-practices-for-children-and-students-with-disability-august-2016.pdf

the demand for separate segregated provision. Building an Inclusive Education system will not happen overnight but nor does it need to take a generation (as has been admirably demonstrated in other jurisdictions). The GARP must commit to the construction of education infrastructure that is accessible and inclusive. Clear timelines for the desegregation of schooling must be made now to stem the waste of life chances experienced by young people living with disability.

Recommendation 25: The Greater Adelaide Regional Plan (GARP) should endorse the provision of Inclusive Education in all schools and specifically rule out the establishment of new segregated education provisions anywhere in the Greater Adelaide region effective immediately. This must preclude any new 'special' schools, units, programs, or similar.

5.2.3. Health infrastructure

The South Australian disability community has seen adverse consequences in recent times because of inaccessible new health infrastructure at the new Royal Adelaide Hospital. This inaccessibility was due to the lack of genuine engagement with people living with disability throughout the entire build process. While the development involved people living with disability at the start of the process, the focus diminished during the build process, and basic accessibility and inclusion elements were lost by the time the build was complete. Not only was this embarrassing at the time but it made it much more expensive to rectify those basic elements. This not only provides important lessons for the development of new health infrastructure, but, indeed, for all social and community infrastructure.

To avoid the same thing happening again with future health infrastructure and for the GARP to demonstrate real leadership on matters of accessibility and inclusion, we emphasise the importance of recognising the need for people living with disability, among others, to have a voice at the table during the planning process and to be involved in decision-making processes as part of authentic co-design throughout the entire project, so that new health infrastructure is designed with accessibility and inclusion at the forefront of priorities. This will help ensure this infrastructure is fully accessible and inclusive to all members of our community, including (but not limited to) young families and children, parents and children living with disability, grandparents, First Nations people, the CALD community, healthcare workers, and visitors.

Recommendation 26: The Greater Adelaide Regional Plan (GARP) should include outcomes and measurable targets for the accessibility of health infrastructure across Greater Adelaide.

5.2.4. Changing Places

JFA Purple Orange has strongly advocated for more Changing Places facilities to be provided in the region, which will enable people with high support needs to access and participate in their communities. South Australia currently has only 18 facilities compared to Victoria that has 113 out of 247 nationally (listed in the online directory).[23] Therefore, it is critically important that the GARP recognises the need for facilities such as this to boost the accessibility of our communities, including at shopping precincts, parks, beaches, recreation facilities, and other public spaces. We understand there is often commentary about the maintenance and security of these facilities, including the potential for vandalism, however there are a range of management options for Changing Places to be kept secure, for example through the use of MLAK keys[24] that restrict access to only those who genuinely need to use them.

Changing Places facilities are a crucial element of meeting minimum standards of accessibility. This is acknowledged in the State Disability Inclusion Plan, known as *Inclusive SA*. Additionally, the 2021-22 *Inclusive SA* Annual Report highlights the Federal Government's commitment to co-contribute to a Changing Places facility in each of the 400 Local Government Areas (LGAs) nationally that currently do not have a facility by 2025-26 in order to 'ensure no person with disability is left behind'.[25] Given South Australia has 68 LGAs, the State is falling well short of this benchmark, including in the Greater Adelaide region. The GARP should highlight the benefits of Changing Places to creating accessible communities and measure the progress of their roll out. We note that Changing Places are

[23] Changing Places, 'Find a Changing Places toilet', accessed 28 March 2023, available at https://changingplaces.org.au/find.
[24] For further information, see Changing Places, 'MLAK Keys', at https://changingplaces.org.au/mlak.
[25] Government of South Australia, 'Annual Report 2021-22: Inclusive SA State Disability Inclusion Plan 2019-2023', available at https://inclusive.sa.gov.au/__data/assets/pdf_file/0017/141641/Inclusive-SA-Annual-Report-2021-2022.pdf.

currently regarded as among the best design and construction options available, but this should not prevent the Commission or government investigating alternative models that achieve the same outcome.

Recommendation 27: The Greater Adelaide Regional Plan (GARP) should promote the roll out of Changing Places facilities and include a measure to track progress.

5.3. Creating a public realm that includes everyone

The public realm is a broad term that captures all spaces open to people that are not under private ownership or subject to restricted access. It is an important concept because it is impossible to list every aspect of community space as a specific consideration (although we have highlighted a few examples above). Therefore, such an expansive term can broaden the horizon of the things we think about when we talk about making places accessible to all. In other words, we are talking about everyone being able to access everything in the public realm on an equal basis with others. We are not talking about 'equivalent' access or special separate provisions for particular people. Those approaches are exclusionary and have no place in society. The GARP should reflect and respond to the need to make the public realms of the Greater Adelaide region accessible to everyone and set interim targets to achieve this.

The accessibility of the public realm also has implications for many other aspects of life. According to a recent report by the University of Tasmania, 'well-known urban scholars and advocates like Jane Jacobs, Paul Davidoff and David Harvey... [have] signaled concern for the erosion of public spaces and commons.'[26] They then added, 'the community design movement emerged from the 'realizations that the mismanagement of the physical environment is a major factor contributing to the social and economic ill of the worlds and there are better ways of going about design and planning'.[27] When the University asked people living with disability what kind of community spaces were important to them, they

[26] Lisa Stafford, Matt Novacevski, Rosie Pretorius, Pippa Rogers, 'What makes inclusive communities? Meanings, tensions, change needed', Planning Inclusive Communities Research Project Stage 1a report 3 MAR (2023) *University of Tasmania* 17.
[27] Ibid.

identified parks, beaches, and the bush; places where there was an opportunity to watch birds, smell flowers, listen to the ocean, be present with wildlife and other natural sensory experiences, with some saying this gave them 'a sense of life'.[28] To ensure that people living with disability have equal opportunity to engage with and be revitalised by the natural world, the GARP must recognise the need for green spaces within the public realm to be accessible for everyone.

Recommendation 28: The Greater Adelaide Regional Plan (GARP) should adopt an expansive vision of the public realm and recognise the critical importance of making green spaces accessible to everyone.

5.4. Making emergency infrastructure accessible

There is growing awareness of the disproportionately high risks that disasters pose for people living with disability. In response, there has been academic and governmental recognition, interstate and internationally, that co-designing, and regularly engaging on, emergency policies and procedures with the disability community is essential for reducing these unacceptable dangers. With almost one in five Australians living with disability and given the increasing frequency and severity of disasters and unprecedented events, it is essential that the GARP recognises the need to involve people living with disability in the planning of new emergency infrastructure. Co-design is needed particularly regarding location and accessibility of evacuation and relief centers. Existing emergency refuges should also be assessed for their accessibility. So too should procedures and emergency information channels are other elements where accessibility has sometimes been overlooked, notwithstanding advancements that were achieved during the Covid-19 pandemic.

Recognising the need to, at the very least, consult with the disability community regarding planned emergency infrastructure would increase compliance with Australia's international

[28] Ibid 22.

obligations. Australia is a signatory to the Sendai Framework for Disaster Risk Reduction 2015 – 2030, and article 7 states:

> Governments should engage with relevant stakeholders, including women, children and youth, *persons with disabilities*, poor people, migrants, indigenous peoples, volunteers, the community of practitioners and older persons *in the design and implementation of policies, plans and standards.* [emphasis added]

Meanwhile, Article 11 of the United Nations Convention on the Rights of Persons with Disabilities states:

> States Parties shall take, in accordance with their obligations under international law, including international humanitarian law and international human rights law, *all necessary measures* to ensure *the protection and safety of persons with disabilities* in situations of risk, including situations of armed conflict, humanitarian emergencies and the occurrence of *natural disasters.*

With the rising rate of disasters and unprecedented events, people living with disability must not be overlooked in the essential planning for how communities in Greater Adelaide prepare, respond, and recover from all types of potential emergencies.

Recommendation 29: The Greater Adelaide Regional Plan (GARP) should make accessible emergency infrastructure, procedures, and information provision a top priority and include an outcome and targets to achieve this.

5.5. Providing accurate information about accessibility

Notwithstanding the urgency of investments in accessible community infrastructure, we recognise that the extent of change that is needed will not occur overnight. In the meantime, the GARP should prioritise consideration of new consistent standards for the dissemination of information about accessibility across the Greater Adelaide region. Governments, businesses, organisations, and management bodies should be required to make freely available clear information about what accessibility features exist in their spaces and what is not accessible according to a basic framework co-designed by people living with disability. This would make it much easier for people to go about their lives

without the excessive need for research and enquiries (often misleading) to plan their days. It would also encourage people to expand their horizons and community interactions beyond those places that they already know to be accessible, which is good for businesses and for creating a rich diverse community life in Greater Adelaide.

Recommendation 30: The Greater Adelaide Regional Plan (GARP) should commit to an action that requires the co-designing and implementation of a simple framework, definitions, and standards for the provision of information about the accessibility status of places and spaces that can be used by governments, businesses, organisations, and others to communicate clear consistent information to the public.

6. Conclusion

Thank you for the opportunity to contribute a submission toward the development of this important plan for the Greater Adelaide region.

The GARP must include strategies to increase the supply of accessible dwellings throughout the region to fulfil existing unmet needs and to futureproof housing supply for a rapidly ageing population that increasingly prefers to age-in-place. It must elevate community places and spaces and the importance of planning and designing for inclusive neighbourhoods alongside its focus on growth for new housing and jobs. It should insist that all community and social infrastructure is fully accessible to meet the needs of the whole community including people living with disability, older people, people with short-term injuries, parents with prams, delivery workers, and all others with mobility needs. Each of these critical elements that are largely overlooked in the Discussion Paper will pay economic and social dividends far exceeding the effort and resources required to implement them.

We would like to advise the Commission of our eagerness to participate in further opportunities to shape the draft GARP. We are very keen to meet with the team working on developing the plan to discuss our submission and answer any questions you may have. We invite you to arrange this by contacting Mr Robbi Williams, CEO of JFA Purple Orange, on [redacted] or via email at [redacted]

7. Appendix A – Draft Accessible Housing Overlay Code Amendment (SA Planning and Design Code)

Insert:

Accessible Housing Overlay

Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	Housing that is accessible to, and readily adaptable for, a range of occupant and visitor useability needs is assured and promoted.
DO 2	High-quality accessible housing design and construction is assured and promoted.
DO 3	Accessible housing that is located in close proximity to accessible community infrastructure, including, but not limited to, public transport, healthcare, and education, is assured and promoted.
DO 4	Accessible housing that positively contributes to the liveability and inclusiveness of neighbourhoods is assured and promoted.
DO 5	Accessible housing is suited to a range of incomes including households with low to moderate incomes.
DO 6	Accessible housing that enables ageing in place is assured and promoted.
DO 7	Accessible housing caters for a variety of household structures.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Division	
PO 1.1 Development comprising 10 or more dwellings / allotments incorporates accessible housing.	DTS/DPF 1.1 Development results in 0-9 additional allotments / dwellings.

PO 1.2 Development comprising 10 or more dwellings or residential allotments provides housing suited to a range of accessibility needs.	DTS/DPF 1.2 Development comprising 10 or more dwellings or residential allotments includes a minimum of 15% accessible housing that complies with the 'Gold level' of the Livable Housing Design Guidelines (Fourth Edition, 2017) provided by Livable Housing Australia, except where: (a) Concessions or exemptions under the mandatory National Construction Code 2022 Livable Housing Design Standard apply to 15% or more dwellings or residential allotments, then 25% of remaining dwellings or residential allotments comply with the 'Gold level' of the Livable Housing Design Guidelines (Fourth Edition, 2017) provided by Livable Housing Australia.
PO 1.3 Accessible housing is suited to a range of incomes including households with low to moderate incomes.	DTS/DPF 1.3 Affordable housing includes a minimum of 15% accessible housing that complies with the 'Gold level' of the Livable Housing Design Guidelines (Fourth Edition, 2017) provided by Livable Housing Australia.
PO 1.4 Accessible housing is distributed throughout the development to avoid an overconcentration.	DTS/DPF 1.4 None are applicable.
Built Form and Character	
PO 2.1 Accessible housing is designed to complement the design and character of residential development within the locality.	DTS/DPF 2.1 None are applicable.
Movement and Car Parking	
PO 3.1 Sufficient accessible car parking is provided to meet the needs of occupants of accessible housing.	DTS/DPF 3.1 Dwellings constituting accessible housing are provided with accessible car parking of at least 1 car park per dwelling.

Procedural Matters (PM) – Referrals

The following table identifies classes of development / activities that require referral in this Overlay and the applicable referral body. It sets out the purpose of the referral as well as the relevant statutory reference from Schedule 9 of the Planning, Development and Infrastructure (General) Regulations 2017.

Class of Development / Activity	Referral Body	Purpose of Referral	Statutory Reference
None.	None.	None.	None.

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Wednesday, 15 November 2023 12:42:38 PM
Attachments: image001.gif
image002.gif
image003.jpg
RAA Submission to the GARP Discussion Paper 20231115.pdf

You don't often get email from [redacted]. Learn why this is important

Good afternoon

Please find attached RAA's submission to the GARP Discussion Paper.

Kind regards

Ethan Gates
Manager - Policy

RAA Group
101 Richmond Road, Mile End SA 5031
| M [redacted] | raa.com.au

RAA acknowledges the Traditional Custodians of Countries throughout Australia and their connections to land, sea and community. We pay our respects to Elders past, present and emerging, and extend that respect to all Aboriginal and Torres Strait Islander peoples.

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Submission to the

Greater Adelaide Regional Plan

November 2023

Motor | Home | Travel

RAA

RAA at a glance

South Australia's largest
member-owned
organisation

Advocating for South Australians for
120 years

805k+
current members
(60% of SA adults)

630k+
South Australian homes and cars insured

1,200+
staff employed across SA

344k+
roadside rescues per year

60,000+
uses of the MyRAA app fuel feature per month

14,000+
solar panels installed per year

40,000+
Holidays booked per year

33,000+
school students educated on road safety each year

9,500+
child restraints fitted or checked each year

$874k+
per year invested in community grants and sponsorships

Foreword

RAA welcomes the opportunity to make a submission to the Greater Adelaide Regional Plan Discussion Paper.

As the state's largest member organisation representing over 805,000 South Australians and reaching into more than 70 per cent of households, we exist to make life easier for our members and the community.

For 120 years, RAA has been advocating on behalf of our members to help South Australians stay safe on our roads and travel around our great state. Today, our core business cuts across motor, home, travel, and energy, which puts RAA in a unique position to engage with the SA Government on the development of the GARP.

RAA supports a bigger, better South Australia that is safe, sustainable, and liveable. We believe strong population growth will spur economic activity and create more opportunities for young people. However, as our state grows towards two million people over the next decade, we also need to maintain its unique liveability.

Population growth will only support liveability when the infrastructure is developed in parallel. Housing developments, both greenfield and urban infill, must be supported with upgrades to road networks, schools, health facilities, public transport, and energy infrastructure, with clear lines of responsibility and transparency for action.

Furthermore, the increase of natural disasters in recent years has highlighted the need to invest in disaster mitigation measures and more consciously consider the relationship between land use planning and extreme weather risk. As South Australia's leading personal lines insurer, RAA is committed to working with industry and governments to reduce the risk of natural disasters. Reducing risk will improve insurance affordability and avoid future financial costs to homeowners, businesses, governments, and communities.

The transition to electric vehicles will help decarbonise personal transport and change the way we fuel our vehicles and power our homes. The convergence of the home and car presents enormous opportunities and the GARP needs to be considerate of the additional energy demand and need for smart home infrastructure that will be required to support this transition.

In the following submission we address the key areas and questions posed in the Discussion Paper relevant to RAA members. In particular, we focus on what the GARP can do to ease cost of living through increased housing supply, reducing home energy bills, improving insurance affordability and lowering transport costs.

We also provide advice on what is needed for our road network, future mobility trends, electric vehicle uptake, and public and active transport infrastructure.

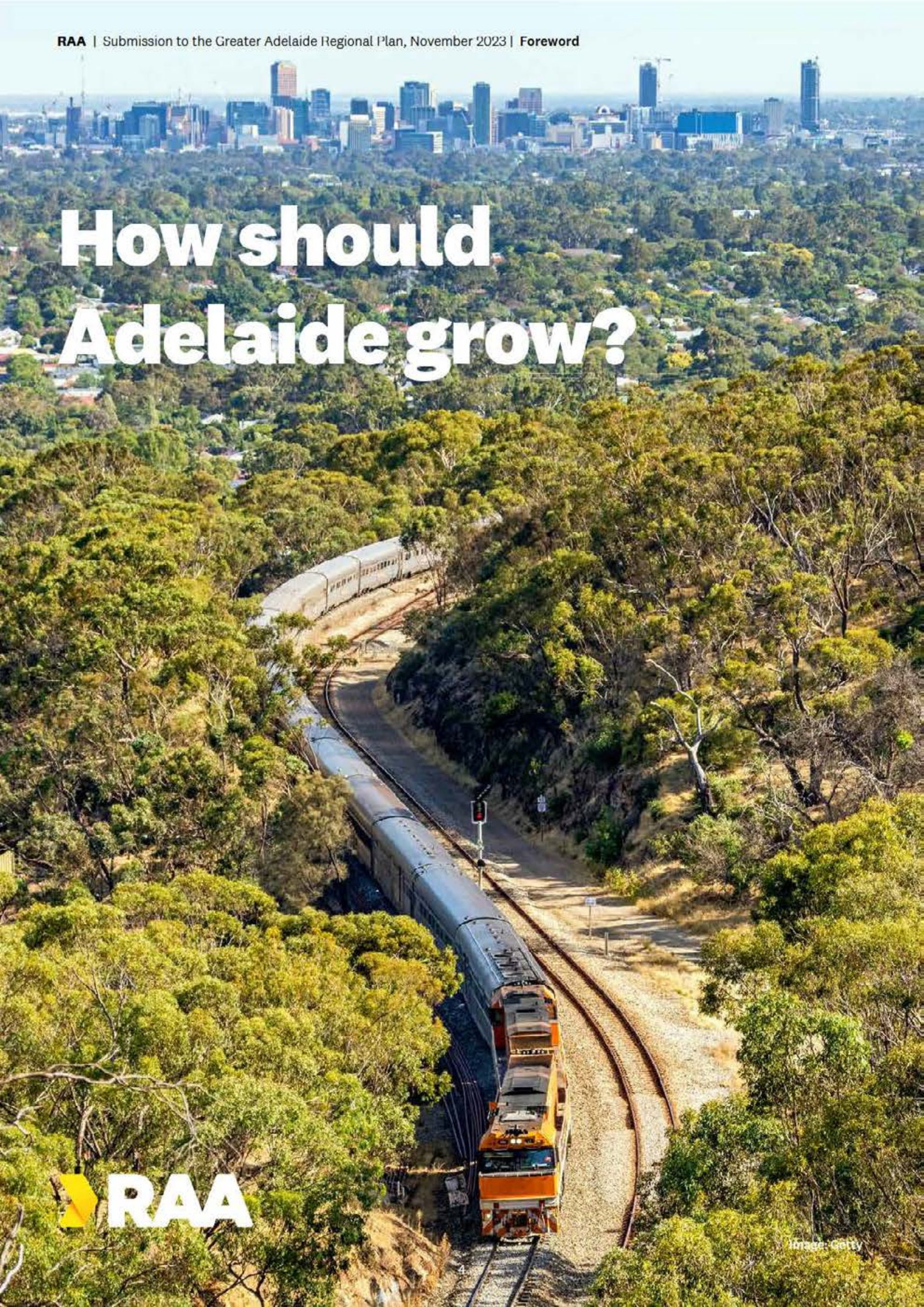
On behalf of our members, we thank you for the opportunity to provide a submission to the Discussion Paper.

RAA is buoyed by the Government's renewed approach to this important planning task. We are supportive of the Government's intention to plan for a high-growth scenario and look forward to ongoing engagement as the GARP is developed and implemented.

Emily Perry

General Manager,
RAA Community and Corporate Affairs

How should Adelaide grow?



RAA

Image: Getty

Outcomes for Greater Adelaide

What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider?

RAA supports the four outcomes identified in the Discussion Paper to guide the discussion about how Greater Adelaide should grow ('greener', 'equitable', 'strong economy', and 'choice of housing').

However, RAA believes the Government should consider aligning the outcomes of the GARP to the United Nations Sustainable Development Goals including those under SDG 11: 'Make cities and human settlements inclusive, safe, resilient and sustainable'. This will enable greater transparency and international benchmarking of outcomes. For example, goals that align with SDG 11 could include (but not be limited to) measurable and ambitious targets for:

- Proportion of population that has convenient access to public transport, by sex, age and persons with disabilities.
- Ratio of land consumption rate to population growth rate.
- Direct economic loss attributed to disasters in relation to global domestic product (GDP).

Recommendation 1

SA Government align outcomes for how Greater Adelaide should grow to the United Nations Sustainable Development Goals.

Outcomes for Greater Adelaide (continued)

What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?

RAA believes changing mobility systems will have a considerable impact on land use in coming years.

Electric vehicles

Electric vehicles are the future here and around the world and RAA believes South Australia should lead the nation in the transition to EVs to capitalise on our abundant supply of renewable energy and reduce motoring costs.

After a slow start, it is clear that Australia is now catching up to the rest of the world when it comes to EV adoption. EV sales have accelerated rapidly, with 3,538 sold in SA throughout 2023 (January to September), which is more than double the amount of EVs sold in all of 2022.[1]

The emergence of EVs presents significant opportunities to decarbonise personal transport and RAA is proud to be playing a part in supporting EV adoption by building 140 EV charging sites across the state, with support from a State Government grant.

Notwithstanding the immense opportunities of EV adoption, some challenges are emerging which are relevant to the GARP.

To support public EV charging, ongoing investment in the energy network is required to fill gaps and to increase capacity at high demand locations.

One of the key lessons to date from RAA's experience in installing public charging infrastructure is that parts of the network are not capable of hosting DC rapid and ultra-rapid EV chargers. Some regions, specifically the Limestone Coast and Yorke Peninsula, are particularly challenging. Others such as the Eyre Peninsula are relatively DC charger ready, although this can differ between towns and within sub-regions.

RAA has been advised that the network upgrades required to install DC chargers in some areas are simply not feasible. Network modifications carry very high costs and can take several years to implement. From the network service provider perspective there is no motivation to prioritise these upgrades over other competing priorities.

DC chargers are required to charge EV batteries in the lowest amount of time, addressing the main barriers to EV uptake – range anxiety and extended travel time. Ideally chargers should be built in areas that provide the greatest convenience to drivers; however, RAA believes that without intervention and scaling up, network capacity will limit where they may be located. This will create gaps in the public charging network that may be seen as barrier to EV uptake.

While public charging availability is critical to supporting EV uptake, most EV charging will occur in the home, which will create additional demand for electricity in residential areas.

Greenfield developments and urban infill must be considerate of the need to support home EV charging when determining the need for electricity infrastructure.

RAA believes that preparing new builds for smart EV charging should be a priority. This includes ensuring that buildings are Vehicle to Grid (V2G) and Vehicle to Home (V2H) ready to allow EV owners to export energy from their EV battery to power their home or to sell back to the grid.

In the near future, V2H and V2G technologies will provide flexible and dispatchable storage behind the meter. A September 2023 report by the Australian Energy Market Commission (AEMC) stated: "The Commission expects substantial new investment in EVs will increasingly

1. Federal Chamber of Automotive Industries, VFACTS

Outcomes for Greater Adelaide (continued)

drive two-way and controllable power transfers between individual consumers and the broader power grid."[2]

This interaction with the grid creates a need to ensure appropriate industry standards for charging equipment and inverters. The Energy Security Board has recently consulted on this matter, resulting in strong stakeholder support for setting of minimum equipment standards for chargers at a national level, and a strong preference for use of international standards.[3]

The AEMC is supportive of consistent national technical standards for Consumer Energy Resources (like EV batteries) and have recommended energy ministers lead the development of a national regulatory framework for technical standards.[4]

Recommendation 2

SA Government works with the Australian Government, state/territory governments, industry groups, standards bodies, and equipment manufacturers to establish nationally consistent standards for Vehicle to Home and Vehicle to Grid bi-directional charging.

Energy

Where possible, the GARP should be considerate of opportunities to service a growing population using our existing energy infrastructure, to avoid additional investment where possible.

Through greater uptake of time of use tariffs, there is potential to shift electricity demand to off-peak periods, therefore easing the need to build more poles, wires, substations, and other infrastructure to satisfy peak demand.

A key to shifting South Australians to these tariffs is encouraging greater uptake of smart meters among existing households. While new builds have a smart meter installed by default – there is a need for a 'critical mass' of smart meters to encourage energy retailers to develop innovative products – meaning that established homes need to be encouraged and incentivised to have a smart meter installed.

The installation of smart meters can be expensive for consumers where upgrades to switchboards are required. This a key barrier to smart meter adoption and has deterred many from pursuing solar panel installations. During the 2023 financial year, approximately 15% of RAA solar quotes that did not proceed cited switchboard upgrade costs as a key reason.

RAA understands the cost to install smart meters is generally passed on to consumers by retailers, with costs spread across their customer base. RAA believes if switchboard upgrades are required to install a smart meter, these costs should be considered part of the smart meter installation and should not burden individual households with upfront costs.

The GARP should complement the Government's recently announced energy transition policy (in development) and, in line with the 'greener' GARP

2. *Final Report - Review into consumer energy resources technical standards (RCERTS) (aemc.gov.au), page i*
3. *Microsoft Word - 5.1 EV Smart charging - Response to consultation - December 2022.docx (datocms-assets.com), page 6-7*
4. *Final Report - Review into consumer energy resources technical standards (RCERTS) (aemc.gov.au), page ix*

Outcomes for Greater Adelaide (continued)

outcome, population growth areas in Greater Adelaide should seek to capitalise on community-level renewable energy schemes, such as Virtual Power Plants and community batteries.

Recommendation 3

SA Government take action to create a smart home ecosystem in South Australia through:

- Increasing smart meter uptake in established homes by ensuring necessary switchboard upgrades are installed at no upfront cost to the household.
- Further Government investment and expansion of community-level energy programs such as incentives for rooftop solar PV and home batteries, expanding Virtual Power Plants and installing community batteries in new developments.

Micromobility

RAA supports the use of e-scooters in SA as they can connect people with public transport on the first/last mile of journeys, improving accessibility to trains, buses and trams. The uptake of micromobility devices has the potential to replace cars for short or medium trips, contributing to reduced traffic. Also, as these devices are powered by rechargeable batteries, they can also assist in the decarbonisation of transport and contribute to a cleaner environment for the region.

In April-May 2023, SA Government sought consultation on laws for micromobility devices like e-scooters. To date there has been no decision made on the legality of privately owned e-scooters on public land. This is problematic from a safety perspective - according to our research 22% of RAA members believe that e-scooters are already legal to ride on public land.[5]

Designing an appropriate regulatory framework and implementing a comprehensive education and enforcement regime is important to ensure safe operation of these devices for all road and footpath users.

Recommendation 4

Should e-scooter use on public land be made legal, supported by a safest practice legal framework, the SA Government investigate and encourage investment in additional off-road paths to accommodate and encourage e-scooter use, as part of a broader plan to increase cycling and walking participation.

5. RAA Internal Research, May 2023

Outcomes for Greater Adelaide (continued)

Car sharing

RAA encourages the Government to consider car sharing an emerging trend that may impact land use in the Greater Adelaide region in the near future.

Research has shown that car share schemes can reduce the need for personal car ownership, with each car sharing vehicle removing between 7 and 13 private vehicles from the road. Vehicle Kilometres Travelled (VKT) also reduce for participants of car share schemes, with North American studies finding that VKT dropped between 7.6% and 80%. Research looking at the impacts of car sharing in North America has consistently shown it to reduce private vehicle use and ownership, while supporting sustainable modes of transportation (public transport, cycling, and walking).[6]

Car sharing may have the following implications for the GARP:

- Car sharing is a useful way to reduce parking demand for apartment living – a number of new apartments being built across the country have zero or less than one park per apartment, either within the building or nearby.
- Car sharing also helps with street space where new homes have reduced frontages – e.g., one old home may be knocked down with three new houses in its place, but the street space now needs to accommodate three homeowners instead of one.
- Car sharing (along with other forms of shared mobility) strongly complements public transport, which has the overall effect of driving higher patronage.
- More data and information sharing by shared mobility operators can help Councils and Governments better plan routes and infrastructure.

Connected and autonomous vehicles

RAA believes the SA Government should actively monitor developments in connected and autonomous vehicle technology, as innovation in personal vehicles and public transport can potentially have implications for the state's transport planning and land use. For example, over the long term, when fully autonomous vehicles exist – car sharing of autonomous vehicles could dramatically reduce parking demand. Connected vehicles may also travel more efficiently on roads and reduce the need for further development. These technologies may also require alternative road design features such as sensors.

RAA has considerable expertise in future mobility, and we look forward to working with Government to accommodate new technologies as they develop.

6. Shaw, M. Twenty Years of Car Sharing: A case study on the City of Vancouver's role in the growth of car sharing in Vancouver, Page 22

A greener, wilder and climate resilient environment

What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment?

RAA is supportive of the GARP outcome of a greener, wilder and climate resilient Adelaide.

The need to take a multi-faceted approach to achieving this outcome is clear. There is a need to decarbonise transport through greater uptake of walking and cycling, as well as transitioning public transport to zero emissions, which we note is already underway. Already, South Australia is a leader in renewable energy generation; however, more can be done to decarbonise homes and we support the need for the GARP to identify opportunities for community energy generation and battery schemes at land division stage.

It is encouraging to see a strong focus on flood protection and disaster management in the Discussion Paper. RAA strongly encourages SA Government to maintain and elevate these elements in the GARP.

The increase of natural disasters and higher insurance costs has highlighted the need to reduce risk by investing in disaster mitigation measures and more consciously considering the relationship between land use planning and extreme weather risk.

The benefits of investing in disaster mitigation measures is highlighted by research commissioned by the Insurance Council, which found that a five-year program of resilience measures costing approximately $2 billion could reduce costs to governments and households by more than $19 billion by 2050 — a nearly tenfold return on investment.

RAA has welcomed recent disaster mitigation investments from the Federal Government, including the $1 billion Disaster Ready Fund, announced in October 2022. RAA believes this can go further and supports calls from the Insurance Council to move disaster resilience funding to a 10-year rolling program and for state and territory governments to match funding.

Disaster resilience funding could be used for measures to reduce risk to homes, such as community level flood mitigation (such as along the Gawler River), flood levees and home retrofits. Funding could also be used for buy-back schemes for those living in extreme risk areas, as seen in other states. Such community resilience measures can further reduce flood risk to complement changes to planning and building codes.

The insurance industry is best placed to work with government and developers on ensuring new homes are not at adverse risk to floods, fires or other disasters. To this end, as South Australia's leading personal lines insurer, RAA is committed to working with industry and governments to help influence these public policy settings to reduce pressure on insurance premiums and avoid future financial costs to homeowners, businesses, governments, and communities.

Recommendation 5

Prior to completing the GARP, SA Government conduct targeted consultation with the insurance industry to better understand natural disaster risk in greenfield growth investigation areas. Where these areas are at adverse risk to floods or fires, alternative sites should be identified and/or development should only occur if risks can be appropriately mitigated.

This could include minimum building heights, the use of resilient construction materials or community mitigation options, such as levees.

A more equitable and socially cohesive place

What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?

RAA is encouraged by the Government's focus on living locally and by identifying the need to further develop along public transport corridors.

RAA strongly supports increased investment in public transport in South Australia. An attractive and convenient public transport system can reduce carbon emissions and road congestion by encouraging people to reduce their reliance on private car use. It can also service the mobility needs of those unable to drive themselves, including children, older people, people with disability, people in financial hardship, and visitors such as tourists.

Unfortunately, use and satisfaction of public transport in South Australia is consistently poor compared to other mainland states. A 2021 Productivity Commission report on Public Transport Pricing found that South Australia has the lowest proportion of work trips that involve more than one mode of PT, with 5.5% of trips, compared to 21.2% of trips in Perth (highest). According to Department for Infrastructure and Transport data, boardings are yet to recover to pre-COVID19 levels: Boardings for April to June 2023 were 15.9 million, compared to 19.4 million in April to June 2019 – a fall of 18%.

Furthermore, planning for public transport in new developments has not been done well in the recent past—adding to car dependency. For example, residents at Mount Barker that travel into Adelaide have few public transport options resulting in increased congestion on the South Eastern Freeway.

Public transport should be a consideration at the beginning of the investigation and planning stage of any future housing developments. This is particularly important for rail, where it is essential to quarantine land for a rail corridor from the outset. RAA supported the Government's decision to preserve land for a future rail

A more equitable and socially cohesive place (continued)

extension to Aldinga and supports preserving a corridor to extend the Gawler rail line to Roseworthy and further north to Freeling.

In 2022, RAA engaged the Legislative Council Select Committee on Public and Active Transport, making a submission and presentation at Parliament House. RAA believes the Government should conduct a holistic review of the Adelaide Metro network to identify:

- Improvements to Adelaide Metro network bus routes to better service business and education hubs and areas of interest outside of Adelaide CBD.
- Adelaide Hills to Greater Adelaide bus service improvements including priority for Glen Osmond Road to enhance service efficiency and reliability.
- Improvements to bus scheduling and stop locations, aimed at increasing service frequency and speed of travel, while maintaining adequate service coverage with consideration for vulnerable users.
- Ways to improve public confidence in the cleanliness and security on board public transport and at stops and stations.
- Identify strategic locations to install indented bus stops, priority bus lanes and traffic signals and new Park 'n' Ride facilities.
- Investigate reasons for low train patronage compared to other states and develop next steps to deliver service improvements of the train network, including optimising bus and tram services to better connect to trains and investigating options to increase service frequency of trains.

These recommendations were informed by research conducted by RAA which included survey responses from 1,320 South Australians, with many responses commenting on a lack of service options for their main destinations.

The development of the GARP provides the perfect opportunity to conduct this review and implement changes for an enhanced public transport system.

Recommendation 6

SA Government conduct a holistic review of Adelaide's public transport network to optimise coverage and increase service frequency for the current population – with a plan to develop the network needed to support the future population and layout of the region.

Sustainable transport infrastructure funding

Accommodating an additional 300,000 homes will require investment in the transport system, including roads, public transport and active transport infrastructure. The projects required to make these improvements will likely require co-funding from the Australian Government.

RAA wishes to highlight that one of the main sources of road-related revenue – fuel excise – is shrinking as more EVs and fuel-efficient vehicles replace older less efficient models. Over time, this means those that can only afford to drive older less fuel-efficient cars are left paying fuel excise.

For more than a decade, several tax reviews and reports from the Productivity Commission, Infrastructure Australia, and transport advocates have highlighted the problem with fuel excise and called for a fairer and more sustainable system.

In recent years, various state and territory government have introduced state-based charges on EVs. However, in October 2023, the High Court of Australia found that by majority s 7(1) of the Zero and Low Emission Vehicle Distance-based Charge Act 2021 (Vic) ("the ZLEV Charge Act") is invalid on the basis that it imposes a duty of excise within the meaning of s 90 of the Constitution. With this decision, States are not able to collect a road user charge.

With this decision, the Australian Government must work with states and territories to develop a nationally consistent approach. This should also provide an opportunity to address the inequity in the fuel excise system.

RAA supports replacing fuel excise with a nationally consistent distance-based charge on all light vehicles, regardless of the type of car they drive, to ensure there is a sustainable revenue model to fund transport infrastructure and maintain safe roads into the future.

This would ensure that:

- Transport infrastructure funding is not reliant on fuel excise revenue which is declining with the adoption of low emission and electric vehicles.
- There is a fairer, equitable, and transparent funding system.
- The charge is not considered or misunderstood as a tax just on EVs.
- All motorists regardless of vehicle contribute towards the cost of building and maintaining a safe and efficient transport network.

The application of a distance-based charge should be introduced in way that does not disincentivise adoption of EVs. For example, a lower rate and/or incentives could be applied to EVs to compensate for the charge. All revenue from the charge should be directed exclusively to land transport and electric vehicle infrastructure.

A strong economy built on a smarter, cleaner, regenerative future

What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?

RAA encourages the Government to engage industry to understand the land use and urban design needs of knowledge-rich employers.

In 2023, the Committee for Adelaide produced its first 'Benchmarking Adelaide' report which compares Adelaide against a group of global peer cities across a range of metrics. This research found:

"Across most sectoral breakdowns Adelaide has a smaller share of jobs in high wage and knowledge-rich sectors. It is 5th of 6 peers for the share of jobs in business services, design and scientific R&D (7.1% in Adelaide compared to 9% on average). Such international figures reflect the need identified for more scientists, computer programmers, cyber security architects, and engineers, and for more variety of high value exports (South Australia Productivity Commission)."[7]

The report continues:

"Efficiency of Adelaide's infrastructure and land-use is likely to become a bigger shaper of the city's future productivity performance, as the city shifts into sectors that rely on speed, knowledge and an urban labour market."[8]

The Government should review and consider the impact of initiatives like MAB at Tonsley and Lot Fourteen in the CBD and consider whether further innovation hubs in strategic locations can contribute to a smarter future for Adelaide's economy.

7. CFA-Benchmarking-Report_FINAL-DIGITAL_compressed-1.pdf (committeeforadelaide.org.au), page 25
8. CFA Benchmarking Report, page 26

A greater choice of housing in the right places

What else could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?

RAA believes that the Discussion Paper does well to acknowledge the importance of a mix of housing types and locations. Our research demonstrates that the majority prefer free-standing home. However, people of different ages, and different family structures will have an appetite for different housing types – therefore a mix is necessary.

In late 2022 RAA asked its members about housing choice. The desire to live in a freestanding home was dominant, with 86% of our members indicating a preference for this housing configuration. However, the importance of housing options was clear when taking a deeper look at the survey results.

Preferred housing type and location varies by age, with younger members displaying a preference for free-standing homes and older members – for example those over 60 – showing a greater appetite for single story units. For families with young children, a free-standing home is the clear choice, but for 13% of families with teenagers, a townhouse was most desirable, compared to only 4% of families with children under 13-years old.[9]

RAA encourages the Government to explore policy options for providing greater choice of housing for South Australians. Other states have implemented stamp duty concessions or exemptions for pensioners looking to downsize. For example, pensioners looking to downsize and purchase a home for less than a specified amount could be eligible for a stamp duty exemption. A similar scheme in SA may increase housing supply and choice of housing.

RAA supports moving away from an infill vs greenfield target ratio, as was applied in previous 30-year Plan iterations. Instead, the Government should be looking to maximise the available land to build the residences that people want to live in, and this requires a mixture of urban infill, greenfield and satellite city development.

Recommendation 7

SA Government conduct ongoing research into housing choice – planning strategy and implementation should then be aligned with this research, to ensure that South Australians have access to their preferred housing type as they move through different life stages.

9. RAA internal research, January 2023

The urban form to bring our vision to life

What neighbourhood features enhance living and working locally?

The ultimate goal of living locally is to establish 20-minute neighbourhoods, where individuals can conveniently fulfill the majority of their daily requirements through a short 20-minute walk, bike ride, or public transport trip from their residences.

A well-connected and pedestrian-friendly neighbourhood stands as a robust solution to address various urban and environmental challenges. The presence of bike paths, footpaths, and accessible public transport not only fosters healthier lifestyles but also enhances connectivity to essential destinations.

A clearly defined transport network developed using Movement and Place thinking is important. For example, development immediately adjacent key distributor roads (with high "movement" function) should be limited to allow safe movement of all forms of transport, whilst precincts and local streets (with high "place" function) should facilitate a safe and accessible place for all users.

RAA has long called for greater commitment from the Government in developing the state's cycling and walking infrastructure. The recent "Benchmarking Adelaide" report produced by the Committee for Adelaide benchmarked Greater Adelaide against 19 international peer cities. The report found: "Adelaide ranks last among peers for the quality of its bike network, and in the bottom 3rd among 170 American and European cities… it also ranks last among peers for access to people, jobs and educational institutions and shopping areas through low-stress biking routes".[10]

The GARP presents a real opportunity to implement an active transport strategy and action plan, backed by dedicated infrastructure funding of at least $10m annually. By making short/medium trips safer and more efficient to walk, cycle or use e-scooters, the Government can create a landscape that is supportive of living locally.

We believe the following should be prioritised:

1. Off-road cycle, pedestrian, and shared use paths
2. Greater connectivity of on-road cycle paths
3. Physical barriers between cyclists and motorists

RAA has now conducted two 'Risky Rides' surveys, with the most recent report published in March 2023.[11] Our latest survey received 761 nominations from concerned cyclists and motorists that identified gaps in cycling infrastructure, resulting in the following top priorities for cycling infrastructure investment:

- Provision of new shared paths adjacent to roadways in the Adelaide Park Lands has the potential to reduce reliance on arterial road corridors. Shared paths adjacent Greenhill Road and Main North Road were the most highly raised suggestions in the 2022 Risky Rides survey. Specifically, a safer cycling route is required along Greenhill Road, from ANZAC Highway to Fullarton Road and RAA believes a new off-road shared use path is the best option.
- Within Adelaide, completion of the next stage of the Frome Street Bikeway between Rundle Street and North Terrace must be a high priority. Furthermore, a high number of nominations for east-west roads through the city indicates that there is still high demand for the provision of an East-West Bikeway to provide safer movements and better connectivity between the east and west of Adelaide.
- Ultimate completion of the North-South Corridor will deliver a major change in movement in and around Adelaide. Improved cycling connectivity must be delivered through the delivery of the North-South Corridor. Whilst the current South Road surface road has minimal provision for cyclists and is not a popular cycling route, it provides high connectivity with other cycling routes, both on-road in the east-west direction between Adelaide and the coastline, and with popular cycle corridors such as the Marino Rocks Greenway, Mike Turtur Bikeway, Westside Bikeway and River Torrens Linear Park.

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10. CFA-Benchmarking-Report_FINAL-DIGITAL_compressed-1.pdf (committeeforadelaide.org.au), page 51
11. Risky Rides – Advocating for safe roads and paths for cyclists | RAA

The urban form to bring our vision to life (continued)

- Due to metropolitan Adelaide's grid-like structure, "diagonal" corridors that bisect the grid such as North East Road, Lower North East Road/Payneham Road, Port Road, Anzac Highway and Glen Osmond Road will always provide travel time and distance savings for cyclists commuting to and from the city when compared to alternative local-street bikeways. However, these corridors vary greatly in terms of the cycling infrastructure they provide. Therefore, any future planning needs to consider the primary function of these roads in Adelaide's road network, ensuring that cyclist infrastructure is a key consideration. Off-road bikeways adjacent these corridors vary significantly in infrastructure, and with further investment and robust planning, have the potential to provide competitive alternatives to on-road cycling in terms of total commute time.

Further, availability of community and local transport options, such as the Keoride on-demand bus in Mount Barker is important which provides an effective and highly utilised first and last-mile connectivity to the Mount Barker interchange. A reliable and convenient public transport system makes it easier for residents to commute and access essential services within and beyond the neighbourhood.

Access to car-parking is a regular concern raised by communities, especially in brownfields areas where urban infill occurs through property subdivisions. Many within these communities feel entitled to an on-street car park, whilst garage space is often utilised for storage or as an extension of the home to facilitate a home office, gym, or entertaining room. On-street parking demand should be a consideration for developments that lack adequate parking facilities. On-street parks should consider the requirements of typical vehicle buying preferences, for example EVs are often wider than many Internal Combustion Engine vehicle models.

Recommendation 8

Alongside the GARP, SA Government should develop, and fund the implementation of, an active transport strategy and action plan to support greater uptake of cycling, walking and micromobility.

Comments on infrastructure and services

RAA supports population growth and is buoyed by the Government's intention to plan for a high growth scenario. In the past, infrastructure has not always kept pace with population growth and housing developments, with issues in Mount Barker being well-documented. There are also flow on issues with the 'middle infrastructure', where developments create congestion on roads several kilometres away.

In early 2023, RAA surveyed members to understand their views on population growth. While many opposed population growth, the main issue was that the infrastructure was not keeping pace. If we peel back the layers, very few people have an issue with an increasing birth rate or attracting people to move to SA. Their concern arises if that growth compromises their quality of life – whether that be through more congested roads, greater demand on services, and more competition for jobs.

RAA strongly believes that the GARP must ensure housing developments, both greenfield and infill, are supported with upgrades to road networks, schools, health facilities, public transport, and energy infrastructure, with clear lines of responsibilities and transparency for action.

RAA is hopeful the establishment of the Housing Infrastructure Planning and Development Unit will help ensure the right infrastructure is in place to support future growth.

If infrastructure doesn't keep pace with growth, there will be significant implications for safety, productivity and liveability.

Where should Adelaide grow?

Greenfield and satellite city growth

What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?

As a travel provider, RAA is deeply aware of the tourism appeal of Victor Harbor and the Riverland, for which Murray Bridge serves as an important hub. Should government target these locations for development to accommodate a growing population – we strongly support protecting the tourism characteristics of these areas that attract travellers from within SA, interstate and overseas. For example, among domestic tourists, there were 1.4 million trips to The Murray and 834,000 trips to the Fleurieu Peninsula in the year ending June 2023.[12]

Development should not diminish the appeal of the natural environment or detract from attractions or accommodation for tourists.

Recommendation 9

SA Government ensures that Victor Harbor and Murray Bridge areas maintain their unique tourism characteristics with any development plans.

What do you see as the benefits and potential drawbacks of greenfield development?

Ultimately the benefit of greenfield development is the increase in supply of freestanding larger homes which are most desirable for South Australians.

In principle, in all growth areas, it is important that the required road and access infrastructure improvements keep pace with the growth in population, or preferably are undertaken prior to the completion of large urban estates.

The Government can learn from experiences where a lag in road development has negatively impacted residents, including in Mount Barker (Heysen Boulevard) and residential growth areas (Angle Vale, Playford Alive, Blakes Crossing, Playford North Extension within the City of Playford - Curtis Road, Heaslip Road).

RAA suggests that the 'living locally' concept is particularly important for greenfield developments in outer areas. Typically transport costs are higher for people living in the outer suburbs. Therefore, it is important that greenfield sites be developed with consideration of urban centres that provide employment opportunities as well as services such as shopping and health care.

Movement and place thinking should be integrated into the further development of all urban precincts. This thinking recognises that streets can serve as key destinations in their own right and is useful for the practical implementation of transport planning objectives.

Land available for greenfield developments is often at higher risk of floods or fires. RAA recommends that the Government work with the insurance industry to understand the risks and to ensure that new homes and infrastructure are built to a higher level of resilience where needed.

12. Domestic tourism results | Tourism Research Australia

Comments on proposed greenfield and satellite city investigation areas

As stated previously, RAA strongly believes that the GARP must ensure housing developments, both greenfield and infill, are supported with upgrades to road networks, schools, health facilities, public transport, and energy infrastructure, with clear lines of responsibility and transparency for action.

RAA makes the following comments around what transport infrastructure investments would need to be made in proposed greenfield investigation areas.

North-western spine

The GARP Discussion paper notes the potential for additional housing along the southern end of the Port Wakefield Highway. Safety along the Port Wakefield Highway is of concern, and improvements to roadside barriers and intersections are highly important, given the current 110km/h speed limit. RAA is particularly concerned about safety for vehicles turning right from Port Wakefield Highway, Mallala Road or Brooks Road.

The recently signalised intersection at Angle Vale Road/Riverlea Boulevard is the only such intersection between Port Augusta and departing the North-South corridor near the city. Should this intersection be grade separated, it would be safer and promote the free flow of traffic, akin to a freeway interchange.

Depending on the proposed development in Two Wells, primary access to town (Mallala Road or Brooks Road) should be upgraded, and potentially grade separated also (depending on projected population).

Increasing urban development in Virginia is also increasing traffic at the Old Port Wakefield Road intersection, and investigation into safety treatments at this location should also be undertaken.

RAA supports extending the Gawler rail line to Roseworthy along the existing disused rail corridor, noting the future possibility of extending this further north to Freeling.

North-eastern spine (Kudla to Evanston Gardens)

Importantly, these areas are adjacent the Gawler Line and are therefore already well connected to Adelaide by public transport. Continued investment in the North-South Corridor also means this area is now a 35-minute drive (approximately) from Adelaide. As development accelerates, access to these train stations is important.

Eastern spine from Callington to Murray Bridge

Major growth in the Callington/Murray Bridge area (combined with Mt Barker/Nairne and Strathalbyn) will put added pressure on the South Eastern Freeway without providing significant opportunities for local employment and other amenities.

This would provide more justification for an Adelaide – Murray Bridge rail line via Mt Barker and Callington. However, a train trip from Murray Bridge to Adelaide via Mt Barker, Blackwood/Belair/Mitcham etc probably wouldn't compete well from a travel time perspective, compared to on-road options (bus/private vehicle).

RAA have previously recommended Murray Bridge as a possible trial area for on-demand bus transport to improve local accessibility.

Southern spine and opportunities around Victor Harbor and Goolwa

Road upgrades are needed, including to Main South Road between the Southern Expressway and Victor Harbor Road (we note that a planning study is currently underway).

The Government should also be looking to duplicate Victor Harbor Road between McLaren Vale and Mount Compass (A corridor study has been recently undertaken, with RAA providing input in 2021).

Additional upgrades to the Victor Harbor Road and Goolwa Road corridors will be needed to improve safety and efficiency/capacity between Victor Harbor/Goolwa and Mount Compass.

Comments on proposed greenfield and satellite city investigation areas

Alexandrina Road between Goolwa and Strathalbyn, and Port Elliot Road between Victor Harbor and Goolwa may also require upgrades because of significant population increases around Goolwa.

RAA have previously recommended Victor Harbor - Goolwa as a possible trial area for on-demand bus transport to improve local accessibility and the need for an appropriate public transport solution is increased with a growing population.

RAA encourages Government to investigate the following:

- Would on-demand transport be effective in Greenfield investigation areas?
- Will there be safe and dedicated access to the train stations for active transport?

Recommendation 10

SA Government consider the following at the commencement of investigating greenfield areas:

- the capacity, connectivity and safety of roads and intersections
- availability of efficient public transport; and
- connectivity for active transport.

Government should then commence improvements and upgrades at the early stages to ensure new residents to these areas are not unfairly disadvantaged.

Urban infill growth

Where is the next generation of strategic infill sites?

The Discussion Paper poses a need to investigate strategic infill opportunities in and around urban centres such as Noarlunga, Marion, Tea Tree Plaza, and Elizabeth. RAA would like to offer the following comments regarding these areas.

Access to these centres is often primarily by motor vehicle, and they're not always well served by active modes of transport, or even public transport – despite being a hub for public transport out of the urban activity centre. For shopping trips, many will prefer to take a private vehicle to avoid walking, cycling or taking public transport with shopping. There is often demand for urban infill around these centres (e.g. within walking distance of the major public transport hub) and planning codes should allow for denser style living, where it is not essential to own a car to get around, and car sharing schemes may provide sufficient access to a motor vehicle for residents.

Existing centres are often managed by large retail groups (e.g. Westfield), and there are concerns about users parking in retail car parks to then use public transport or other nearby facilities – and leaving insufficient parking for visitors to the centre. For example, parking fines are regularly issued to commuters at Tea Tree Plaza in Modbury who use the shopping centre car park to access the public transport interchange. This same centre saw controversy when the car park was blocked off in the mornings to prevent staff and visitors to Modbury Hospital from using the shopping centre car park.

Urban space and urban greening

What are the most important factors for the Commission to consider in meeting future demand for open space?

A significant amount of open space will be returned to the community upon completion of the North South Corridor, and provision of a continuous, safe and separated cycle corridor. As stated previously, South Road currently is not a popular cycle corridor but does link in with several key corridors e.g. West Side Bikeway, Mike Turtur Bikeway, Marino Rocks Greenway.

There is room for improvement in off road corridors in metropolitan Adelaide in terms of accessibility to commuter cyclists, with many opting to cycle on arterial roads (the less safe option) instead. Bikeways along local streets can provide a safer riding environment, but often come at the expense of increased travel time. Some direct corridors, including the Mike Turtur Bikeway and the Outer Harbor Greenway, could be enhanced to give path users continuous travel across local streets. Others such as the River Torrens Linear Park Path may have capacity for dedicated cycleways.

Safe routes need to be openly and easily available to potential users, and improvements to wayfinding and delineation of the routes themselves are also needed.

Further comments

The Discussion Paper is missing any mention of road safety and does not mention the state or national road safety strategies. Many of the key transport/road elements of the GARP should be considerate of state and national road safety strategies and action plans to ensure that the targets can be met. Specifically – if aiming for zero lives lost by 2050, the impact of urban development on the metro fringe area on the safety of the road network should be considered.

RAA supports and encourages the roll out of electric and hydrogen powered buses and trains to reduce the carbon footprint of the public transport system and further offset emissions for those who choose public transport as an alternative to driving privately owned vehicles.

Electrification of the Gawler and Seaford rail lines is welcomed, and opportunities for the Outer Harbour, Grange and Belair lines must be explored as diesel trains approach the end of their service life. We note that Government is exploring hybrids and hydrogen powered options and this should continue.

New urban developments must be accessible via public transport and RAA strongly supports extension of the Seaford line to Aldinga, and extension of the Gawler rail line to Roseworthy. Investigation into the provision of public transport is required at new and future developments including Riverlea (Buckland Park), Dry Creek and Concordia.

Submission to the Greater Adelaide Regional Plan

November 2023

Motor | Home | Travel

RAA

DTI:PlanSA Submissions

From: Maria Zotti <[redacted]>
Sent: Monday, 6 November 2023 1:50 PM
To: DTI:Plan SA; DTI:PlanSA Submissions
Cc: DTI:Plan SA; Philip Roetman; Naomi Doolette; Diane Salvi; Herd, Jon; Kat Ryan; [redacted]; Joshua Bowen; James Kelly; Peters, James (DEW); Whitcher, Sarah (DEW); Andrian Wiguna; [redacted] Jeremy Miller; Stefan Caddy-Retalic; Andrew Nesbitt (LGA)
Subject: Resilient East Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: Resilient East Submission Greater Adelaide Regional Plan Discussion Paper.pdf

Some people who received this message don't often get email from [redacted] Learn why this is important

Dear Growth Management Team

Thank you for the opportunity to provide a submission to the Greater Adelaide Regional Plan Discussion Paper. Please find attached the Resilient East Submission.

In Summary, the Resilient East Steering Committee supports the four themes highlighted in the Discussion paper and believes that the themes have the potential to create a more climate resilient and sustainable future. However, they will require significant changes to business-as-usual practices in order to be effective and to enable climate safe housing and communities and liveable cities.

Kind regards

Maria Zotti

Chair of Resilient East

Maria Zotti
Manager Environment & Sustainability Services

T [redacted]
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W www.campbelltown.sa.gov.au

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RESILIENT EAST

Climate Ready Eastern Adelaide

6 November 2023

Growth Management Team,
Planning and Land Use Services
Department for Trade and Investment
Via email: plansasubmissions@ sa.gov.au

Submission – Greater Adelaide Regional Plan Discussion Paper

Resilient East appreciates the opportunity to contribute to the Greater Adelaide Regional Plan Discussion Paper to help inform the future of our region to 2051 and beyond.

Resilient East is a partnership between the Campbelltown City Council, the Cities of Adelaide, Burnside, Norwood Payneham & St Peters, Prospect, Tea Tree Gully, Unley and the Town of Walkerville and the South Australian Government, a regional alliance tackling climate change. Resilient East seeks to ensure the eastern region remains a vibrant, desirable and productive place to live, work and visit, and that our businesses, communities and environments can respond positively to the challenges and opportunities presented by a changing climate.

This submission does not reflect formal Council consideration by any of the constituent Councils. This input is intended, however, to complement the specific planning feedback from participating Councils and provide a perspective from regional climate change adaptation practitioners.

Resilient East also echo comments from the Regional Climate Partnerships (RCPs) and acknowledge the combined input to create this submission. The RCPs are made up of Resilient East, Adapt West, Resilient Hills and Coasts and Resilient South, focused on delivering practical action to strengthen the climate resilience of their communities, economies and natural and built environments. The Regional Climate Partnerships were founded recognising that climate impacts are not limited to individual jurisdictions and that a partnership between government service providers is required in order to achieve the necessary actions to effectively respond to climate threats.

Resilient East sees the Greater Adelaide Regional Plan as a key spatial plan to enable a resilient and climate ready future for South Australia.

Resilient East knows first-hand how powerful these plans are, for example the inclusion of the greening target in the current 30 Year Plan was pivotal to a considerable amount of collective action, strategic urban forest planning and urban greening improvements over the last 5 years.

In Summary, the Resilient East Steering Committee supports the four themes highlighted in the Discussion Paper and believe the themes have the potential to create a more climate resilient and sustainable future. However, they will require substantial changes to business-as-usual practices in order to be effective.

What we Build

- ✓ Consideration of the State Government's commitment to a **Net Zero** future by 2050 is a critical factor to be addressed in the Greater Adelaide Regional Plan, providing for key planning outcomes to enable this transition.

CITY OF ADELAIDE · City of Burnside · CAMPBELLTOWN CITY COUNCIL · City of Norwood Payneham & St Peters · CITY OF PROSPECT · CITY OF TEA TREE GULLY · THE CITY of Unley · TOWN OF WALKERVILLE

- ✓ Achieving "a **greener**, wilder and climate resilient environment" is supported, but the actions outlined in the Discussion Paper are insufficient to achieve this.
- ✓ For **energy efficiency** to have maximum return on investment, it needs to be supported at all stages within the planning system, beyond a simple building rules consent process.
- ✓ It is unlikely that Adelaide will become **less car-dependant** in the next three decades without substantial infrastructure investment and cultural change programs.

Where we Build

- ✓ We need to build in **resilience** for new neighbourhoods. Decision-makers considering the location of new neighbourhoods (strategic infill and greenfields), need to consider the climate conditions a century into the future, to avoid future **hazard risk**.
- ✓ **Living locally** is a proven sustainability principle but conflicts with the principles of increased urban sprawl and low-medium density development.
- ✓ Urban infill is unavoidable, and there are ways to do it better. One of the best ways to reduce a **carbon footprint** is to live in a smaller house close to other people.

Resilient East acknowledges the planning system for Greater Adelaide is a complex issue and is committed to working together to grow a resilient city for everyone. Below is more detailed discussion to Resilient East's key points for further consideration.

Discussion

The Discussion Paper highlights key themes for a positive and resilient future, these being:

a. A greener, wilder and climate resilient environment
b. A more equitable and socially-cohesive place
c. A strong economy built on a smarter, cleaner, regenerative future
d. A greater choice of housing in the right places.

While Resilient East supports the inclusion of themes that create a more climate resilient and sustainable Regional Plan, continuing business-as-usual in planning policies and systems will not create this future and will most likely lead to negative outcomes such as further canopy loss and hazards. The previous 30-year Plan for Greater Adelaide (2017 update) set the foundation for the current State Planning Policies and associated objectives in the Planning and Design Code. The current State Planning Policies (SPP) related to climate resilience include:

- Design Quality 2.3 'The development of environmentally sustainable buildings and places by applying Water Sensitive Urban Design and energy efficiency design solutions.'
- Climate Change 5.4 'Mitigate the impacts of rising temperatures by encouraging water sensitive urban design, green infrastructure and other design responses.'

For climate ready buildings and sustainable development outcomes, the associated performance objectives (PO4.1-4.3) in the Planning and Design Code are the single source of planning policy for assessing development applications across SA.

However, it is well recognised that there is a large and clear gap between these policy commitments and implementation mechanisms, and therefore, the results are not being seen on-ground. So, while the previous Regional Plan set the policy framework and targets that filtered into other parts of government, on-ground action is still lagging behind. This new Regional Plan needs to be different and be more specific about the key mechanisms that will enable this change to occur.

This change needs to occur quickly. In the face of a rapidly changing climate, and failing planning policies, Resilient East cares about:

a. A carbon-positive future (and the role of planning in achieving Net Zero emissions),
b. Cost of living (a focus on operational life-cycle costs for more efficient homes, not just the up-front building cost),
c. Insurability (Where we build, and what we build),
d. Health and wellbeing (are homes protecting and promoting good health in the face of extreme weather?), and

e. Not creating new risks (because there is enough legacy risk to manage now).

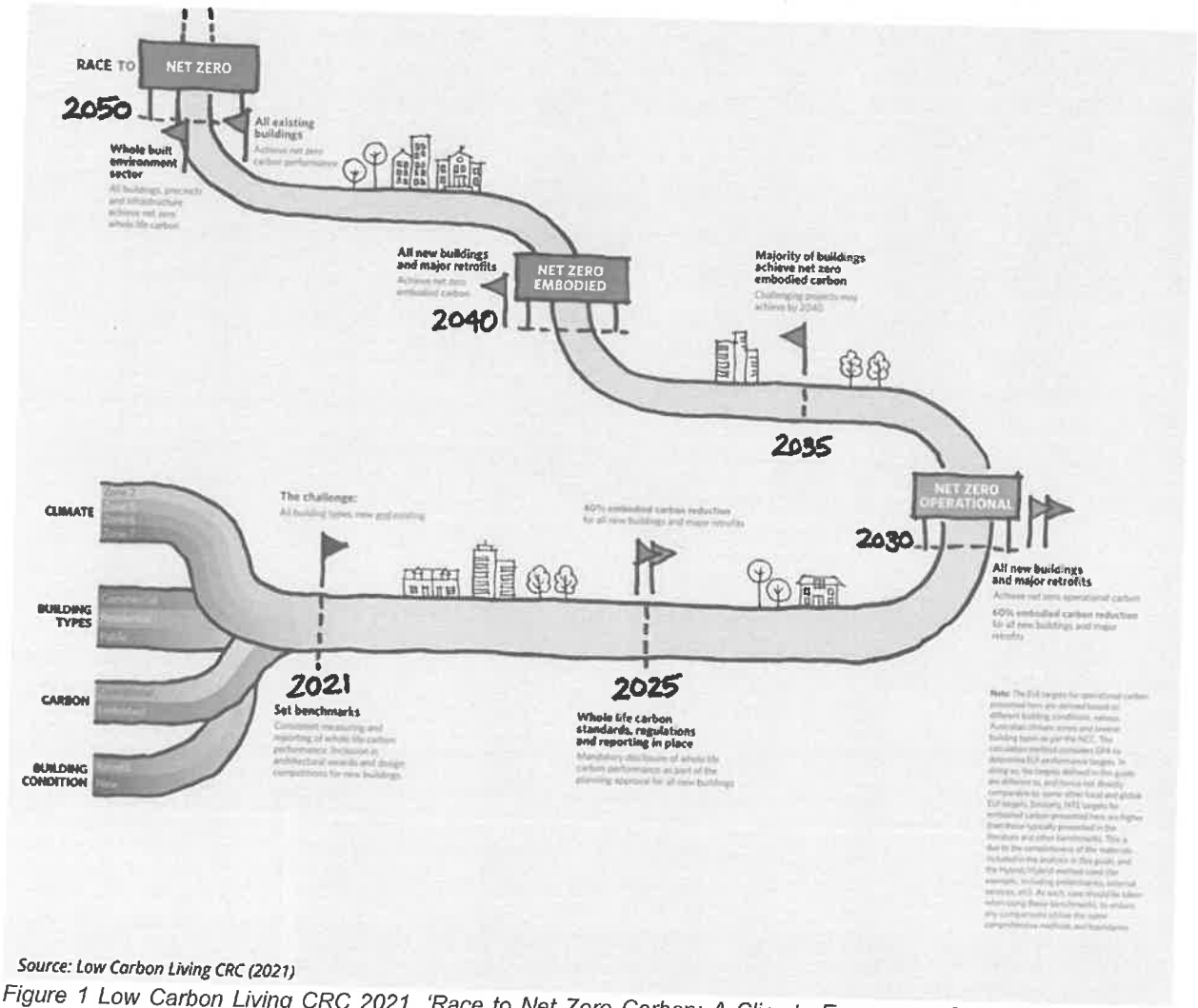
To achieve this, Resilient East discusses some specific points that should to be included within the Greater Adelaide Regional Plan, including Net Zero commitments, Greening, Hazard Avoidance, Sustainable Living, and Reducing Car Dependency.

1. Net Zero

The South Australian Government has set goals to reduce South Australia's greenhouse gas emissions by more than 50% below 2005 levels by 2030, and to achieve net zero emissions by 2050. To meet these targets, this is a critical window of opportunity to create the policies that will enable communities to achieve this outcome in less than 25 years. As this Greater Adelaide Regional Plan is about growth to 2051, much stronger alignment is therefore needed for it to support and enable the complete transition to net zero (eg. Net Zero buildings, electrify everything, space for solar and wind generation and battery storage, higher density living, new transmission lines, reduced private transport and increase in public, transport that is integrated into the energy system (BEVs etc)), infrastructure that priorities and encourages active transport.

In moving to Net Zero communities and low-carbon development, the energy efficiency provisions under the National Construction Code (NCC) are currently insufficient to adequately address transitional climate risk. The move to 7 NatHERS stars, slated to commence in South Australia on 1 October 2024, partly addresses this, but it is by no means the only solution required. The recent publication by Planning Institute Australia's (PIA) Achieving Net Zero Report highlights where planning needs to enable this action and reduce carbon in every sector, including Energy, Manufacturing, the Built Environment, Transport, and Agriculture, Forestry, and Land use.

Therefore, in consideration of the State Government's commitment to a Net Zero future by 2050, the Greater Adelaide Regional Plan needs to highlight this as a key outcome to enable this transition. Below is an example of a Net Zero pathway for the built environment as highlighted within the PIA report, adapted from Low Carbon Living CRC (2021).



Source: Low Carbon Living CRC (2021)

Figure 1 Low Carbon Living CRC 2021, 'Race to Net Zero Carbon: A Climate Emergency Guide for New and Existing Buildings in Australia'.

2. Greening

We note the Commission's commitment to achieving "a greener, wilder and climate resilient environment", but the actions outlined in the Discussion Paper are insufficient to achieve this. It is also concerning that there is insufficient recognition of the value of greening in mitigating climate change (through sequestration of carbon) and adaptation (through mitigation of urban heat and a myriad of other benefits). The most recent LiDAR survey of greater Adelaide revealed canopy cover is well below global benchmarks (exact canopy cover percentage currently embargoed). As South Australia's climate becomes steadily hotter and drier, the urban heat island is projected to catapult Adelaide into its first 50C day within the next decade. Urban canopy is critical for mitigating the urban heat islands, but despite strong and collaborative efforts from local governments who have been planting tens of thousands of trees each year, Adelaide's overall canopy is declining.

Canopy Target

Resilient East recommends that the 30% canopy target be reconsidered and replaced with more nuanced targets that consider local conditions. Local conditions could include natural vegetation assemblages, rainfall patterns, the availability of supplementary water sources and future climate change scenarios. This approach would most likely result in lower canopy targets near the coast and higher targets in the foothills. Nuanced targets should be based on benchmarked natural vegetation adjusted for regional variations, and may differ from the 30% overall canopy coverage target across greater Adelaide. Alternatively (or in addition to) they could be broken into land ownership types with different targets for private residential land, streets and open space.

Quality of Canopy

Furthermore, Resilient East advocates for emphasise of the importance of assessing the quality of the canopy as it is as important as the quantity of the canopy across greater Adelaide. Species diversity within the urban forest is a critical factor in creating a resilient and sustainable canopy into the future. Greater Adelaide is facing the challenges of climate change, which will affect the sustainability of its urban forest, which is currently primarily composed of a limited number of temperate zone species. Some species may not be well-suited to Adelaide's transition towards a semi-arid climate. There is a pressing need to rapidly expand the canopy with tree species that are resilient and suitable for the changing climate.

Fortunately, recent investment by local government in greater Adelaide in tree data management systems and on-ground tree audits have yielded a valuable resource and has been used by collaborative project across many Councils and the University of Adelaide Future Trees[1]. This research has led to the accumulation of an extensive urban forest database, encompassing approximately 600,000 trees.

Leveraging this database, provides a unique opportunity to identify rarely-planted tree species that are suitable for increased planting efforts. Furthermore, local and state governments can use this database to provide a comprehensive demographic analysis of the urban forest across the greater Adelaide region, a first of its kind. This data-driven approach will enable local and state governments to correlate tree information with climate data, infrastructure requirements, and social factors. By doing so, new insights into how the urban forest is evolving across greater Adelaide can be gained. Importantly, this approach will help local and state governments identify areas within greater Adelaide that are most vulnerable and require priority attention, target investments effectively and establish a benchmark against which we can measure the success of ongoing greening efforts.

Resilient East recommends that metrics that assess the diversity of tree species and other emerging relevant criteria should be integrated into the canopy target for greater Adelaide.

Strengthening Tree Protection

[1] https://www.resilientsouth.com/futuretrees

A primary cause of tree canopy cover decline is tree removal on private land driven by urban infill. Currently, Adelaide has the weakest tree protection laws of any Australian capital city, which protects only the largest trees – however, there are exemptions to these protections and a lack of an adequate tree valuation mechanism to facilitate investments in urban forests to replace trees that are removed. This means that the easiest default for any developer, including state government agencies, is to remove any trees on a site rather than attempting to retain them.

The Parliamentary Inquiry into the Urban Forest and Planning System Implementation Review have both been presented with strong evidence of the need for stronger tree protection laws and relaxation of encumbrances to greening on public land (e.g. through review of utility and road clearance regulations). These processes need to be systemically reviewed to create a default of tree protection (rather than the current default of tree removal) that has driven Adelaide's canopy down to such alarming levels. The interim report on the Parliamentary Inquiry is a positive step forward.

The SA Government Planning and Land Use Services commissioned report *Urban Tree Protection in Australia: a review of regulatory matters* compares Adelaide's tree protections to those in interstate capitals and provides several suggestions as to how tree protections could be strengthened, including emulating interstate mechanisms and new approaches formulated for South Australia.

Accessible Greenspace

As a general approach, the GARP could focus on adopting, in whole or part of, the 3-30-300 rule. This approach recommends governments focus on achieving:

- 3 trees visible from every home (and business);
- 30% overall canopy at a suburb/neighbourhood level; and
- A maximum of 300m distance between every home and a green space where people can meaningfully connect with nature.

This benchmark is associated with higher public health, lower crime, improved property values and a myriad of other community benefits. Ensuring that new greenfield and brownfield developments achieve compliance with this rule is an important step to improving Adelaide's climate resilience and ongoing liveability.

For practicality at a landscape level, Resilient East recommends the focus could be on the 300 meter component as it has a more solid basis and easier to measure. Ensuring a maximum distance of 300 meters between every home and a green space where people can meaningfully connect with nature is valuable goal.

Remaking and Rewilding Creekline Corridors

Greater focus on creek lines across the Adelaide plains requires a long-term and strategic approach and an excellent opportunity for GARP. Resilient East propose that creekline corridors focus on daylighting of drains and the remaking and rewilding of natural creeklines. This potential is an inspiring opportunity to provide open space that incorporates both biodiversity and active transport corridors. Sections of creeklines that have been remade and rewilded by council's have garnered community support and when designed carefully with laybacks etc can also help address flood hazard reduction.

3. Hazard Avoidance

Climate change is not some future event. We are already experiencing the effects of the changing climate, and these effects will increase over the life of the Greater Adelaide Regional Plan and beyond.

This plan is to 2051. Houses built in new growth areas, earmarked in the GARP, will be housing families in 2090. In deciding the location of new neighbourhoods (strategic infill and greenfields), we need to consider the climate conditions a century into the future – this is how long the effects of your decisions will be felt. We can choose to build in resilience for new neighbourhoods, or choose to build in vulnerability, risks and higher costs to mitigate risks. We must take this opportunity now to build climate safe housing that is sustainable, liveable, healthy and affordable in growth areas for our future.

2090 is the latest year for which we have high-confidence climate projections. In 2090, people born in 2023 will be turning 67 years old. They may have built a house in one of the proposed growth areas in their late 20s. They may have raised a family there, and commuted to work from there, and played sport there. They may still be living in that house – it would be under 40 years old – and be thinking about ageing in place there. A current deficit of the GARP Discussion Paper is that it does not determine if houses in these growth areas will still be climate safe, that is liveable, insurable, comfortable, healthy, affordable to live in, or regularly exposed to flood, bushfire and heat risks.

The best information we have about the future climate was published by Department of Environment and Water (DEW) in 2022[2]. It says that by 2090, Adelaide could experience 121% more extreme rainfall days, 79% more days of extreme heat (35C+) and 64% more severe fire danger days. These are significant changes and will challenge the norms of safe housing for communities. With the GARP's key role being to determine where Adelaide should grow, it is critical to use the available data on where these effects will most be felt – for example, by using spatial models of riverine inundation, urban heat and greening, and bushfire risk – to minimise the vulnerability of current and future generations, and the liabilities of current and future governments.

4. Sustainable Living (Building better housing)

The cost of housing and associated cost-of-living pressures will continue to be an issue in the near to medium term future. With so much attention given to *housing affordability* (i.e. reducing the purchase price of new homes through increasing housing supply) other macro pressures are excluded. While reducing the upfront purchase price of housing is important, ignoring the ongoing *operational* cost (i.e. how much does the house cost to *live* in) is a short-sighted exercise that negates the pressure that many homeowners experience regarding utility costs to maintain comfortable (and safe) temperatures inside their homes. Many homes are now so reliant on air-conditioning to maintain comfort, that the resident is placed in the binary choice of having either a large and expensive electricity bill or going without and being uncomfortable and unsafe – a situation that can impact on the physical and mental health of the occupant.[3] As greater Adelaide shifts from being a Mediterranean to a semi-arid climate[2], providing climate safe housing that addresses heat exposure and health will be of increasing importance.

The low hanging fruit in this equation is energy efficiency. While energy efficiency is part of building rules consent, for energy efficiency to have maximum return on investment, it needs to be supported at all stages within the planning system. This can include a consideration of lot composition and orientation, materials and design, shading and green space and retaining trees on site as a matter of course and not an exception.

With the National Construction Code energy efficiency change from 6 to 7 stars in SA now pushed back to October 2024, it could be considered a 12-month lost opportunity to introduce higher standards for homes built in South Australia. While acknowledging this factor, it is also vitally important to acknowledge that the South Australia building industry is currently under intense pressure. We have seen several high-profile building companies collapse in recent months with what the Housing Industry Association is calling a "profitless boom". For South Australia to change this around, meeting population growth and housing supply targets, while addressing housing affordability *and* while continuing to be able to adequately service the current and projected growth, something will have to change. While not currently on the agenda, a precautionary principle should be applied to any suggestion that removing sustainability criteria or energy efficiency standards will result in an adequate market mechanism to alleviate industry pressure. All this is likely to do is further project forward key issues, entrenching the cost-of-living pressures and climate vulnerability through increasing hazard exposure.

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[2] Department for Environment and Water (2022) Guide to Climate Projections for Risk Assessment and Planning in South Australia 2022, available at: https://www.environment.sa.gov.au/topics/climate-change

[3] Gertrud Hatvani-Kovacs et al (2018), Heat stress-resistant building design in the Australian context, *Energy and Buildings*, Vol 158, pp 290-299, https://www.sciencedirect.com/science/article/pii/S0378778817307648

Climate hazard exposure is not adequately addressed in the Planning and Design Code. Ideally, in order for the Code to address systemic, cascading and compounding climate risk, the Code should account for (as example) heat hazard exposure, flood risk, sea level rise, storm surges, higher peak rainfall events, increased bushfire risk and extreme storm risk (primarily wind action on structures). A current opportunity exists within the Planning and Design Code to front load climate risk assessments that consider the impact on the useful life of the buildings under different climate change scenarios and demonstrate performance-based outcomes that align with existing climate projections and best-practice outcomes and provide climate safe housing. This consideration also needs to acknowledge that the built environment has a key role in supporting and meeting South Australia's NetZero and emission reductions targets. Essentially, this consideration acknowledges that homes that we build today are going to be operating under a different climate in the future and need to be adequately designed, constructed and assessed to account for this.

5. Reducing Car Dependency

Promoting Active Transport and Reducing Car Dependency

Greater Adelaide faces a unique challenge due to its large footprint and low population density. These factors make it challenging to service through public and active transport routes, leading to a heavy reliance on cars for transportation, . Car dependency is deeply ingrained in the urban form of greater Adelaide. The function of moving cars around, quickly, safely and directly, along with the associated storage required at end of trip, continues to directly influence all land use planning and transport outcomes. In addition, due to a cost premium for space, many newer developments have reduced off-street parking due to smaller garage spaces, which is impacting public space creating unwanted street congestion as residents park outside their homes and issues for kerbside bin storage and placement.

To effectively work towards reducing car dependency, it is crucial to direct land use planning towards creating employment zones near residential areas and improving public transport and active transport routes . However, it is unlikely that Adelaide will become less car-dependant in the next three decades without substantial infrastructure investment and cultural change programs.

Innovative Infill Development

We need greater innovation for infill development. Infill is a necessary mechanism for curtailing the expansion of Adelaide at its fringe and uplifting population density around existing urban activity centres. It can be a way to deliver high-quality housing options and increasing density to house the expected population growth of Adelaide. When done well, infill can provide more choice in the market and a diversity of housing typologies and entry level price-points to accommodate low-income, essential workers, first home buyers and families who want to embrace 'Living Locally' within existing urban environments. However, the elephant in the room as we transition to medium - higher density dwelling options is the spaces and places that we give over to car use.

A key question that can be asked to understand the opportunity afforded by greater infill - is what will innovative land use patterns, that do not require high-levels of individual car ownership actually look like? While these developments would support higher density housing, and be co-located with activity centres, employment lands, and close to public and active transport corridors, it should be that reducing private automobile use is the main driver in the design and development. These developments should be characterised by high levels of green infrastructure, be well-connected, and take advantage of existing underutilised land that is co-located with public and active transport spines.

Road Safety: Improved Infrastructure and Lower Speed Limits

One essential aspect of promoting active transport and reducing car dependency is the development of a vastly improved network of separated cycle lanes and paths. Additionally, lowering the urban default speed limit from 50km/hr to at least 40km/hr, with targeted areas where riders and pedestrian routes are reduced to 30km/hr, is a critical step in promoting safe and efficient active transport options. These measures are essential to achieve the goals of reducing car dependency which also directly reducing transport emissions and alleviating congestion.

Active transport, has demonstrated outstanding health, cost-of-living, and environmental benefits, and with advances in e-bikes, cargo bikes, and other personal mobility devices, the barriers related to distance and carrying capacity have significantly diminished. However, perceived and real safety concerns, particularly for women and families, remain significant barriers.

Women, in particular, tend to be risk-averse and will not travel on the road if they feel unsafe, limiting active transport and micro-mobility options for many. Separated cycle lanes and paths offer a safer and more attractive option for commuters to choose cycling or micro-mobility over cars. This approach is supported by the United Nations Development Programme (UNDP) report, "Safe Cities and Safe Public Spaces for Women and Girls 2010".

Data clearly indicates that pedestrians are at greater risk of death and injury when struck at impact speeds above 30km/h. The most vulnerable pedestrians are children and older people. Similarly, the severity of injuries to cyclists in collisions with cars is closely related to impact speed. The implementation of lower speed limits, specifically 30km/h, in urban areas has consistently proven to reduce the severity of injuries for cyclists, micro-mobility users and pedestrians. A study by Wegman, D. & Aarts, L. in 2006 in the journal "Accident Analysis and Prevention" supports the idea that reducing speed limits significantly reduces fatalities and serious injuries caused by motor vehicles.

Resilient East believes that reducing car dependency is subject to the commitment of a lower default urban speed limit and improved infrastructure to increase safety and ensure active transport options are not gender-restricted.

6. Preparing for Electric Vehicles

Australia's uptake of electric vehicle (EVs) is expected to rise rapidly over the next decade. According to the EV Council, State of EV's Report - July 2022, in 2022 EV sales (as a proportion of new vehicle sales) was 6.5% in South Australia, and in 2023 is already more than double all of 2022. In 2030 the sale of new gasoline and diesel vehicles (internal combustion engine or ICE vehicles) will be banned in Europe and parts of America and 2035 in the UK.

It is anticipated that 80% to 90% of EV owners will charge their EV at home or at work[4]. In 2022, reform to the National Construction Code (NCC) saw the introduction of EV-Readiness requirements. South Australia's requirements will take effect from October 2024, as follows:

- 100% of car parking spaces in apartment buildings constructed will be EV-Ready
- 10% of office car parking spaces will be EV-Ready
- 20% of other commercial buildings will be EV-Ready.

There is currently a gap in the Planning and Design Code as it relates to EV policy and it is critical that policies are included within the Planning and Design Code that support the EV transition to future proof our cities and communities to enable the transition to EVs. It is also critical that planning takes into account the need for EV infrastructure and integration with current energy systems.

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Contact and follow-up

Thank you for your consideration of the feedback provided in this submission. By factoring in climate knowledge, we have an opportunity to build new neighbourhoods that are affordable, liveable, comfortable and healthy.

Should you have any questions please contact me at [redacted]

Yours faithfully

[4] https://electricvehiclecouncil.com.au/wp-content/uploads/2022/08/Home-EV-charging-2030.pdf

[redacted]

Maria Zotti
Manager Environment & Sustainability Services
Campbelltown City Council

Chair
Resilient East Steering Committee

On behalf of Resilient East www.resilienteast.com

CITY OF ADELAIDE · City of Burnside · CAMPBELLTOWN CITY COUNCIL · City of Norwood Payneham & St Peters · CITY OF PROSPECT · CITY OF TEA TREE GULLY · THE CITY of Unley · TOWN OF WALKERVILLE

From: [redacted]
To: DTI:PlanSA Submissions
Subject: Resilient Hills & Coasts submission on GARP
Date: Friday, 10 November 2023 3:30:56 PM
Attachments: Outlook-0bb0ha4t.png
Greater Adelaide Regional Plan_RH&C Submission.pdf

> You don't often get email from [redacted] Learn why this is important

Hello Growth Management Team,

I apologise for the delay on the attached submission, I've had sick kids and didn't realise it didn't send.

I hope it can still be considered.

Many thanks,

Jen St Jack
Principal | St Jack & Co
[redacted]

From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: FW: Submission – Greater Adelaide Regional Plan Discussion Paper- SA Independent Retailers
Date: Monday, 6 November 2023 11:08:01 AM
Attachments: image001.png
SAIR Submission RevB - Final.pdf
image002.png

OFFICIAL: Sensitive

Hi Team

Can you please ensure the attached submission on the GARP Discussion Paper is captured and considered.

Cheers
Britt

Britt Anderson | Ministerial Liaison Officer - Planning
Office of the Hon Nick Champion MP
Minister for Trade and Investment
Minister for Housing and Urban Development
Minister for Planning

P: [redacted]
GPO Box 11032| ADELAIDE SA 5001 | DX 168
Level 10, 1 King William Street | ADELAIDE SA 5000

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From: [redacted]
Sent: Monday, November 6, 2023 11:03 AM
To: [redacted]
Subject: Fwd: Submission – Greater Adelaide Regional Plan Discussion Paper- SA Independent Retailers

OFFICIAL: Sensitive

Can we make sure this gets to where it needs to go please ?

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From: Amanda Price-McGregor <greenlightplanning@outlook.com>

Sent: Monday, November 6, 2023 10:50 am
To: DTI:Office of Minister Champion <MinisterChampion@sa.gov.au>
Cc: [redacted]
Subject: FW: Submission – Greater Adelaide Regional Plan Discussion Paper- SA Independent Retailers

Dear Minister Champion,

Please find **attached** a copy of the SA Independent Retailers & Metcash Food submission on the Greater Adelaide Regional Plan (GARP).

I hope this is of use to you.

Warmest regards
Amanda

Amanda Price-McGregor
Managing Director, Green Light Planning, MPIA
m: [redacted] e: greenlightplanning@outlook.com
a: PO Box 158, Kensington Park, SA, 5068
w: www.greenlightplanning.com.au

From: Amanda Price-McGregor
Sent: Monday, November 6, 2023 10:46 AM
To: 'plansasubmissions@sa.gov.au' <plansasubmissions@sa.gov.au>
Cc: [redacted]>
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper- SA Independent Retailers
Importance: High

Dear Growth Management Team,

Please find **attached** in relation to the Greater Adelaide Regional Plan (GARP) from South Australian Independent Retailers (SAIR) and Metcash, Food.

I trust this feedback is useful to you review and consideration of the submissions received on the GARP Discussion Paper and we would appreciate the opportunity to discuss this in person, once you have had a chance to review.

May I invite you to contact my client [redacted]

Thank you in advance
Amanda

Best regards,
Amanda

Amanda Price-McGregor

Managing Director, Green Light Planning, MPIA
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South Australian Independent Retailers
Supporting local

Growth Management Team,
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001

Via email: plansasubmissions@sa.gov.au, (subject: Submission – Greater Adelaide Regional Plan Discussion Paper)

Dear Craig,

I refer to the Greater Adelaide Regional Plan Discussion Paper (GARP) which is currently out for public consultation and wish to provide the following response on behalf of State's Independent retail sector, South Australian Independent Retailers (SAIR) and Metcash, Food.

1.0 SAIR Background

SAIR advocates on behalf of the 120 owners representing over 200 independent supermarkets stores which are branded Foodland, IGA & IGA Local Grocer. This sector employs some 12,000 people which also includes over 300 staff in the Metcash wholesale distribution centre at Gepps Cross

The Retail/Wholesale Industry is the biggest 'private' employer in South Australia (circa 102,000) and independent supermarkets are the largest sector i.e. circa 12%

As a collective group, this sector is the largest private employer in the State and maintains a greater than 20% market share of the Supermarket sector which is the highest market share for Independent stores in Australia.

The South Australian supermarket industry is a robust marketplace in which the independents vigorously compete against the major national and international chains.

The independents are driven by having a strong emphasis on:

- quality customer service and support
- targeting and promoting local South Australian brands of manufactured food and grocery products
- promoting the largest range of Australian branded food and grocery products
- leading the promotion of South Australian and Australian fresh meat, fresh fruit and vegetables

These factors and the increased competition provided by strong vibrant independent supermarkets is a driving force in ensuring SA shoppers pay less for their groceries versus like for like baskets on the Eastern seaboard.

Independents in South Australia provide excellent career pathways and take the training and development of their staff very seriously, in order to provide local quality customer service and employ more people per store than their competitors.

'advocating for all independent owners of Foodland; IGA and Friendly Grocer supermarkets in South Australia'
PO BOX 2176, KENT TOWN SA 5071 | **M:** [redacted] | **E:** admin@sairetailers.com.au | **ABN:** 82 804 971 951

1.1 SA Retail Market – State of Play

While we are confining our submission in the main to the South Australian independent supermarket sector, the more recent and current state of play is worth outlining as it cuts to the heart of the planning policy positions that we are advocating.

Although the food and grocery sector is experiencing a more 'stable' economy, there are still other factors to consider and as cost of living pressures continue to impact household spending the sector is going to continue to face headwinds post the COVID pandemic

Consumers are holding back on their discretionary spending due to rising cost of living expenses in particular rent, /mortgages and consumables such as energy, healthcare, education, transportation, rates and taxes and insurances etc.

We have like many other industries weathered the COVID pandemic along with natural disasters in terms of storm damage and the current flood risk continues to impact communities we serve.

We are also seeing more regularly in South Australia, 'small shopping centres' across the State with tenancy vacancies up to 50%. In some instances, there are 100% vacancies i.e. completely vacant shopping centres, scattered around both metropolitan Adelaide and regional South Australia.

This is a trend that has been increasing over the last few years in the United States of America. The lag time between their retail market experiences and ours is traditionally around 3-5 years and as such we must act now to sure up our centre's hierarchy to ensure the same does not happen here in South Australia.

Most of our owners are traditionally the anchor tenant in shopping centres. Moreover, the other businesses within these shopping centres are mainly South Australian owned and categorised as SME's e.g. local pharmacies, butchers, florists, newsagents, locally run Post Offices, takeaway shops, bakeries, medical and dental practices etc.

Our family-owned independents' pride themselves in serving their local communities, partnering with their local supply chains, working with all locally owned retail business operators, supporting local service & sporting organisations.

However, our independents are increasingly concerned about urban/retail developments that only consider 'progress for progresses sake' and the 'we need large land holdings and do not want to pay retail floor space rates' and not the unintended consequences resulting from poor planning.

It is our firm and considered view that there is a real need to further strengthen and protect the centre's hierarchy, to avoid additional and unnecessary pressure on the market place, and the hierarchy should be retained in spite of the projected future population growth.

1.2 Alignment with State Planning Policy 9: Employment Lands (SPP 9)

The independent retail supermarket sector are strong advocates for centre-based planning and are in lockstep with the South Australian Government's commitment to activity centre planning through their adoption of the Key Principles of Retail Planning which is reinforced in the State Planning Policy 9: Employment Lands (SPP 9), specifically:

- *Existing centres – recognise existing activity centres, main streets and mixed-use areas as the primary place for commercial and retail activity.*
- *Expansion – allow for expansion of designated centres at 'edge-of-centre' locations.*
- *New activity centres – allow new activity centres to be established to support equitable and convenient access to services, while supporting productive settlement patterns.*

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- *Hierarchy – protect higher-order centres that support a productive settlement pattern, while allowing for smaller-scale activity centres to emerge and diversify.*
- *Urban design – reinforce the role of land use policies to guide urban form and place-making in mixed-use activity centres.*

The clustering of activities in centres, including retail uses with other allied services such as health, education, administration, entertainment and recreation, supports many of the economic, environmental and social outcomes sought by the planning system, such as choice for consumers, transport/infrastructure efficiency and productivity, environmental and heritage protection, resource preservation, employment clustering, and better management of land-use interfaces and potential conflicts.

This clustering of activities in centres minimises the negative impacts and costs which are often environmental and social in nature and can be widespread, including;

- increased vehicular use and reduced public transport use and accessibility
- reduced community access to a focussed hub of services, facilities and amenities
- foregone opportunities for urban intensification focussed around the amenity of activity centres anchored by retail uses
- loss of business synergies associated with clustering

1.3 30 Year Plan for Greater Adelaide

We believe that highlighting our concerns with the current 30Yr Plan for Greater Adelaide (The 30Yr Plan), will help articulate our position and thus the recommendations for this Discussion Paper which we have outlined below.

The current iteration of the 30Yr Plan fails to recognise the importance of centre-based planning and retail catchment analysis and there is real opportunity now, post the gathering of feedback on the Greater Adelaide Regional Plan Discussion Paper to correct those policy anomalies, while providing greater direction and certainty to the marketplace so it can make informed decisions about future planning and investments.

The current 30 Yr Plan advocates for the following policies relating to retail that we wish to focus on;

- *P8. Provide retail and other services outside designated activity centres where they will contribute to the principles of accessibility, a transit focused and connected city, high quality urban design, and economic growth and competitiveness.*
- *P56. Ensure there are suitable land supplies for the retail, commercial and industrial sectors.*

Firstly, there needs to be greater clarity around the use of the word 'retail' and in particular where supermarkets are and are not envisaged and we have previously recommended a definition of the word 'supermarket' as just one way of addressing this matter.

For example……

Supermarket *Supermarket means premises the principal purpose of which is the sale of groceries and foodstuffs to provide for the needs of people who live or work in the local area.*

Secondly, in regard to P8 above, and retail shops outside of designated activity centres, we are of the firm view that this policy is at odds with State Planning Policy 9: Employment Lands (SPP 9), which seeks to recognise existing activity centres, main streets and mixed-use areas as the primary place for commercial and retail activity and allow for expansion of designated centres at 'edge-of-centre' locations.

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When it comes to new activity centres, and where they are best placed, one of the biggest challenges is the lack of centres-planning and retail catchment analysis to determine areas of greatest need, namely where certain centres might be over-trading because demand is out-stripping the current supply of gross of leasable floor area.

For example while the township of Meadows is currently experiencing growth and take up within the new residential land releases is sound, residents need to travel 18-20 kilometres to the nearest supermarket at either Mt Barker, Aberfoyle Park, Strathalbyn or McLaren Vale to do their supermarket shopping.

Coupled with this, the current Local Centre Zone which runs in an east westerly direction through the township is fully occupied with existing built form, with the exception of the local recreational oval. With a township the size of Meadows and the degree of over trading occurring in neighbouring townships, additional appropriately zoned land is required in this township to facilitate a medium sized supermarket in conjunction with other retail tenancies.

In reference to P8 above, previously, there was a view that allowing 'Out of Activity Centres' retailing, in particular supermarkets, was a means to stimulate economic development and jobs growth, but in the absence of greater population growth and increase demand for retailing, this is not the case.

In the past, the location of supermarkets and shopping centres 'out of activity centres' and outside of townships, main streets and core business areas have had dreadful community consequences, dividing towns, sending existing main street businesses broke and resulting in vacant shops littering main streets and townships.

To give a regional context, communities in towns like Renmark, Mt Gambier, Port Augusta, Whyalla and Victor Harbor have seen first-hand the negative impacts of poor planning which allowed ad-hoc 'out of centre development' and while some of these towns are starting to recover now, it has taken many years.

Allowing supermarkets to establish in 'out of centre' zones enables the larger supermarket operators, such as the multinationals, to acquire large tranches of land and develop that land where the entry costs are lower than commercially zoned land, thus giving the 'out of centre' developer a competitive and commercial advantage over their independent competitors.

This represents an uneven playing field, and it is something we are committed to working with the State Government on.

While we support small-scale retailing in the form of local cafes, personal services establishments, offices and consulting rooms to activate and provide convenience services to local communities, we do not support full line supermarkets outside of activity centre zones.

As a result, we believe the Greater Adelaide Regional Plan needs to take a stronger position on 'out of activity centre' retailing, making it clear that it is not encouraged, unless there is a robust retail catchment analysis that identifies over trading at centres outside the catchment, and there is insufficient supply to cater for current demand.

Recommendation 01 The Greater Adelaide Regional Plan needs to take a stronger position on 'out of activity centre' retailing, making it clear this is not encouraged unless there is a robust retail catchment analysis that identifies over trading at centres outside the catchment, and there is insufficient retail floor area to cater for current demand. Moreover, the development of non-residential development outside of centre zones will not diminish the role of the activity centre.

This point immediately above is closely aligned with the current 30Yr Plan's P56 in relation to ensuring there is suitable land supplied for the retail, commercial and industrial sectors.

When it comes to the supply of future retail land, some Councils have been better than others in undertaking their own strategic retail planning and catchment analysis over the years as part of their overarching centres-policy planning.

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PO BOX 2176, KENT TOWN SA 5071 | **M:** [redacted] | **E:** admin@sairetailers.com.au | **ABN:** 82 804 971 951

However, it is important now, with the current and future growth areas and corridors identified for renewal and regeneration, that this retail catchment planning is done in a holistic way, across the entire Greater Adelaide Region.

At present, in some areas, the spatial allocation of new centres appears to be occurring through the creation of 'Emerging Activity Centre Sub Zones' over large traches of land and the identification of potential sites for Activity Centres via a Concept Plan within the Code for example Angle Vale, see below the Suburban Activity Centres are shown via the blue circle on the Concept Plan 17.

Concept Plan 17 Angle Vale

Presumably, these Concept Plans could be updated at any time, therefore changing the location of the future emerging activity centre.

This approach is impacting upon investor certainty and investment decision making.

The current widespread use of Emerging Activity Centre Sub Zones is confusing to landowners trying to sell their land and the use of the Concept Plans (which could be changed at any time) to identify new Suburban Activity Centre sends mixed messages to commercial retail investors, risks sites siting vacant for longer than they should and discourages investment.

Investors are concerned that other sites not currently identified in the Concept Plan as a Suburban Activity Centre could be the subject of a Code Amendment or a change to the concept plan to facilitate a new centre on a site currently not anticipated for an activity centre use.

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To encourage investment, there needs to be more certainty for the market. There needs to more rigor around the location of new and emerging activity centres and they need to be developed through careful centres-planning and based on a detailed retail catchment analysis as opposed to any adhoc location of sites via a Concept Plan update approach.

There is now a need for an activity centre's catchment analysis to be undertaken for the entire Greater Adelaide Region to ensure that future activity centres are located in the right spatial locations, such as current growth areas, areas identified for future growth and areas where the demand for retail floor space is exceeding supply, leading to over trading by centres outside the catchment.

While the location of activity centres and supermarkets specifically within those centres are often part of a master planning process in growth areas and master planned communities, the location of the supermarkets within the activity centre zone could benefit from oversight and recommendations from commercial advisors, providing a retail perspective to how centres best operate and provide the most value to a community.

Ensuring a suitable land supply of retail land is important, but it is critical that new centres are located in the right locations to deliver the greatest benefits to community, whilst not diminishing the role of existing centres.

This also provides the market with clear direction and a firm planning policy base from which to make their future investment decisions.

Recommendation 02. There needs to be a retail catchment analysis undertaken for the Greater Adelaide Regional Area to determine areas that require new activity centres, the size and make up of those activity centres and the siting and location of those new centres.

Recommendation 03 New centres should be clearly identified via an appropriate Activity Centre zoning and should give clarity around whether a supermarket is being sought or not as part of that new centre or not.

2.0 Retail Servicing for Growth Areas

Aligned to the point above, there is a need for future growth areas to also plan for and allocate suitable land aside for retail land uses that are spatially located where they can provide the greatest benefit to those new and emerging communities. Areas such as those identified as regeneration and growth areas need a centres-based planning approach to the location of new activity centres for example Concordia, Sellicks etc

3.0 Where should we grow – Does Defence land present opportunities?

We propose that the scope of where the Greater Adelaide Region could grow in the future, should be expanded upon to also take into consideration land owned and / or occupied by the Federal Government generally, but in particular defence lands. For example, we would see advantages in engaging with the Department of Defence to see if sites such as their Keswick and Warradale Army Barracks and Defence land at Smithfield, adjacent the Munno Para regional shopping centre are still required for their operations, or so they present opportunities for future residential growth.

Recommendation 04 Consideration should be given to engaging with the Federal Government and in particular the Department of Defence in relation to Federal Government land holdings within the Greater Adelaide Region to ascertain if any sites are surplus to their requirements.

4.0 Strategic Infill and Corridor Growth

Figure 10 in the Discussion paper identifies proposed areas of investigation: Strategic infill and corridor growth, see below.

For total transparency, we have a number of Foodland and IGA supermarkets within the areas identified on the plan as being located in the Mass Rapid Transit Investigation Areas. Continuation of trade and access to our supermarkets and

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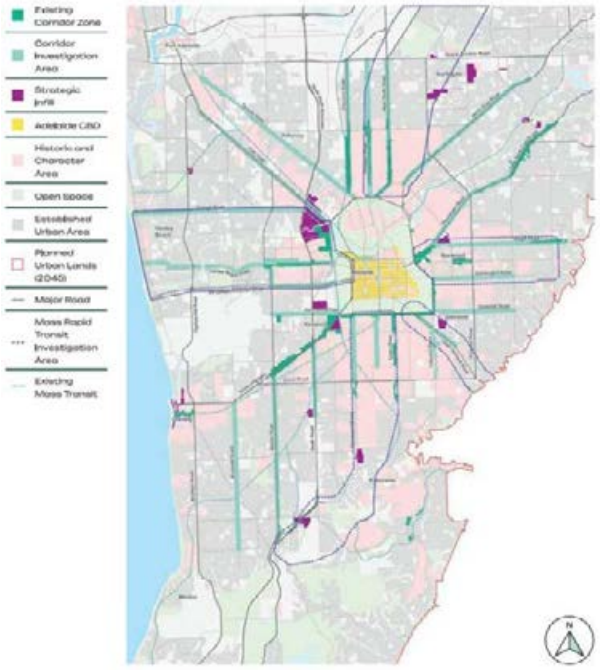
the shopping centres they reside within is critical to the success of our independent owners' businesses and our broader business model.

We would appreciate the opportunity to have early engagement and ongoing discussions with you and the Department of Transport in relation to the planning and status of the proposed mass transit investigation areas as outlined in Figure 10 below.

Figure 10 – Proposed areas of investigation:
Strategic infill and corridor growth



Thank you for the opportunity to comment on this Discussion Paper and we would welcome the opportunity to meet with staff in relation to this submission and to work with them on the next iteration of this discussion paper. Please make contact with Sam Zucco [redacted] or Matt Roberts [redacted] at your convenience.

We look forward to seeing the changes we are recommending being considered and hopefully adopted into the Greater Adelaide Regional Plan to ensure it achieves its intensions while ensuring a level playing field for the retail sector.

Yours sincerely

[redacted]

Sam Zucco

Chairman
SA Independent Retailers

[redacted]

Matt Roberts

General Manager SA/NT, Food
Metcash

(On behalf on the 120 South Australian family owners and the 12000 South Australian employees).

6 November 2022

Cc *Hon Nick Champion, MP*
Minister for Planning

'advocating for all independent owners of Foodland; IGA and Friendly Grocer supermarkets in South Australia'
PO BOX 2176, KENT TOWN SA 5071 | **M:** [redacted] | **E:** admin@sairetailers.com.au | **ABN:** 82 804 971 951

From:	PlanSA Submissions
To:	DTI:PlanSA Submissions
Subject:	Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Date:	Monday, 6 November 2023 3:54:04 PM
Attachments:	SAYP-GARP-Discussion-Paper-Submission.docx.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Advocacy Organisation
Given name:	Julien
Family name:	Beauvillier
Organisation:	SAYP Committee (PIA)
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Please find attached the GARP Discussion Paper submission prepared by the members of the SAYP Committee.
Attachment 1:	SAYP-GARP-Discussion-Paper-Submission.docx.pdf, type application/pdf, 126.7 KB
Attachment 2:	No file uploaded
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

Date: 06 / 11 / 2023

Chair of the State Planning Commission
Planning and Land Use Services
E. saplanningcommission@sa.gov.au

Re: Response from SA Young Planners to the Greater Adelaide Regional Plan (GARP) - Discussion Paper

Dear State Planning Commission,

Thank you for the opportunity to provide feedback to the documents currently on consultation.

This document is written as a submission in response to community consultation on the Greater Adelaide Regional Plan (GARP) - Discussion Paper. It has been prepared by members of the South Australian Young Planners committee (SAYP), a sub-divisional committee of the Planning Institute of Australia (PIA), and the views expressed here are those of the SAYP policy working group, prepared on behalf of the SAYP committee following the group's participation in a Greater Adelaide Regional Plan workshop facilitated by PLUS and subsequent internal discussions and workshops.

The SAYP have chosen to actively engage with community consultation on the Greater Adelaide Regional Plan (GARP), including in preparation of a policy submission, as both an opportunity to engage in constructive debate around how our State plans for the future, as well as to ensure the views of young professionals within the critical profession of planning are heard, including their strong wishes to see a more accessible, inclusive, and efficient planning system - as well as a more resilient, sustainability, and livable future for South Australia.

Who are Young Planners?

A Young Planner is a student or graduate of a planning or planning related degree with up to 5 years post graduate experience. PIA strongly supports the role young planners will play in the future of the profession, The Planning Institute, and the State of South Australia. PIA has had a network of Young Planners that promote, support and represent Young Planners since March 1996. This network operates in each state and territory across Australia. At a state/territory level young planner groups:

- Arrange social and information sessions and activities.
- Support young planners at Divisional levels.
- Promote the role of young planners within the planning profession.
- Foster links between PIA and Universities.

- Promote student and graduate membership of PIA.
- Promote interaction between young planners, especially between student and graduate planners.
- Contribute to community consultation and provide policy responses to proposed policies, reforms or action plans at the local, state and national levels.
- Promote the planning profession as a whole.

The SAYP have organised their submission into a number of key discussion points, all of which draw upon existing themes within the GARP for which consideration and refinement is encouraged.

Growth Areas

The SAYP Committee expresses support for proposed emphasis of new greenfield growth occurring primarily in the North, respecting the value of agricultural and environmental land in Mclaren Vale, Adelaide Hills and Fleurieu Peninsula, and recognising the likely lower costs of infrastructure delivery in this region.

However, the concentration of such growth in a particular region will likely bring its own distinct challenges, particularly in the deployment of service infrastructure such as pipes and roads, and of new communities developing ahead of critical community infrastructure such as schools and medical facilities. Areas that can capitalize on previous, planned, or lower cost-to-deliver investment in major physical and social infrastructure should be prioritized ahead of others, and the north may need to be divided into further sub-regions in which the sequencing of development land can be planned to enable government and private sector interests to better coordinate.

Strategic Infill v General Infill

The SAYP Committee supports a sensible approach to enabling infill development as a means of enabling more housing in proximity to existing services - particularly transport - enabling urban regeneration, and enabling greater housing diversity in existing suburbs.

However, the SAYP Committee supports a prioritisation of strategic infill development (including Urban Corridor and Urban Renewal Zones in the right locations) over general infill development, and targeting zoning settings in existing suburbs which promote a gradual renewal of housing stock rather than the often highly sporadic clusters of land divisions and building activity which councils find challenging to plan for from an infrastructure perspective. In addition, the type of infill occurring in suburbs is often undertaken in an ad hoc fashion, with small blocks of land being developed individually. In this process, little thought or consideration is given to the vicinity or neighbourhood as a whole resulting in repetitive designs of residential units with often high site coverage, low soft landscaping, and streets clogged up with cars. A better designed urban environment could arise from

approaching infill with a broader perspective and using tools such as land amalgamation to create allotments with higher quality of private, semi-private and public open space, better street interaction and climate sensitive design.

A greater emphasis on the provision of housing diversity in the CBD and inner suburbs has also been raised as a priority. Over the last 10 years, our CBD has shown incredible growth with the addition of apartment towers, student accommodations and a wider choice of small businesses, all contributing to the vibrancy of the city as well as its attractivity. It is however noted that the Adelaide city centre still needs a greater variety of housing stock in order to ensure greater choice and affordability for all South Australians and visitors.

High-Growth Scenario

The SAYP Committee supports the consideration of high growth scenarios in order to better prepare for a variety of potential futures. However, concerns were raised regarding the release of residential land both in terms of timing and location. The release or rezoning of additional residential land should relatively closely match the near-term demand of the housing market, and should occur as close to, and in a logical sequence, to maximise the use and accessibility of existing infrastructure, particularly transport, to ensure our new suburbs are as connected as they can be.

The release or rezoning of substantially more land than is required does have the potential to create unintended side-effects, such as the commencement of multiple slow moving development fronts held up by competing infrastructure demands, and the sub-optimal use of existing infrastructure. Prioritising the release of residential land close to existing infrastructure and urban transport routes is the best way to reduce our overall car dependency, limit the extent of urban sprawl and develop a more sustainable South Australia.

The SAYP Committee considered the absence of including existing Train, Tram, and O-Bahn routes as *“key transport corridors*” in *Figure 6: High-level constraints map* to be inadequate.

The SAYP Committee discussed the wording used in the writing of principles 5 and 6 of Part 2: Where should Adelaide grow? The wording used raised questions as to where suitable land would be identified for rezoning, and would an under-supply of housing imply that encroachment into the EFPAs could be easily justified. The SAYP Committee considered that land within the EFPAs would still need to be demonstrated as being *superior* in its justification for development than alternate options.

Regional Open Space

The SAYP Committee expresses support for the focus on regional scale open space networks, including strong support for a review of the previously planned Metropolitan Open Space System (MOSS) and the principles of a State coordinated strategy for the dual objectives of achieving regional scale open space and biodiversity corridors.

A review of the previously planned Metropolitan Open Space System could identify and distinguish between those areas for which the intended open space status of the land has been achieved; either though zoning (Open Space, Hills Face) or ownership (Council, State); areas in which the zoning and/or ownership strategy requires further coordination; and areas which surround existing parts of the open space network and could be considered for future inclusion.

The northern suburbs require a particular focus with regards to a State coordinated strategy for achieving regional scale open space - as the geographical features which have historically given rise to substantive regional scale open and environmental land such as valleys, hills, and rivers are not as present in the flatter north. The creation of an inter-urban break and open space/biodiversity corridor between the Hills and Gawler River in particular requires a coordinated strategy which builds upon existing accumulation of environmental land by PLUS.

Lack of Integrated Transport Planning

The SAYP Committee believes that the GARP Discussion paper was noticeably lacking with regards to long term planning for mass transport, particularly given the extent of land to be opened up to development in the North.

According to the PDI Act: *"A regional plan should include a long term vision for the relevant region or area, including provisions about the integration of land use, transport infrastructure and the public realm"*

For instance, *Figure 2 – Proposed areas of investigation: Greenfield and satellite city growth* should clearly identify existing rail corridors through to Mt Barker, Virginia/Two Wells, Roseworthy, Concordia as "*potential mass transit"*, not necessary as a statement of intent, but as clear recognition of potential mass transit options to be preserved for future consideration.

The SAYP Committee felt that the previous 30 Year Plan for Greater Adelaide, coupled with the Integrated Transport and Land Use Plan (ITLUP) was heading in the right direction by identifying strategic urban corridors, contemplating the upgrade and development of transport solutions as well as the appropriate land uses which could surround them. *Figure 3 – Proposed areas of investigation: Strategic infill and corridor growth* goes some way to maintaining an integrated view of transport and planning at the inner urban scale in identifying *Mass Rapid Transit Investigation Areas,* however the SAYP Committee were concerned that if long-term mass transit and network planning were insufficiently addressed within the GARP, Adelaide was likely to develop in ways that only furthered the challenge of enabling improved public transport in the future

The absence of any reference to a City Underground Rail Link - a previously contemplated mass transit project within the ITLUP which would see north and south rail services connected through the CBD via an underground section - was noted, and its removal was not supported. Adelaide is the

largest Australian city with only a single CBD railway station and without through services, and the limitations of our existing rail access to the whole of the CBD are a major contributor to Adelaide's poor rail patronage relative to other cities. Such a project would provide holistic rail access to the entirety of the CBD, and would enhance the value and patronage of all existing Adelaide Metro rail services. The freeing up of capacity within the existing Adelaide Railway Station would create an opportunity for less-frequent services - such as a service from Mt Barker - to utilise the old station on an express basis - with the ability to easily transfer to other services if required.

The SAYP committee appreciates the acknowledgment that electric vehicles (EV) and autonomous vehicles (AV) are an important technological step-change, rather than a solution to congestion and vehicle-emissions, nor a justification for further prioritising road users to the detriment of active and public transport.

SAYP look forward to future collaborations and community consultations with the State Planning Commission.

Yours sincerely
SA Young Planners

DTI:PlanSA Submissions

From: Belinda Marsh [redacted]
Sent: Monday, 6 November 2023 4:59 PM
To: DTI:PlanSA Submissions
Cc: Brooke Acquaviva
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: SANFL Submission_GARP_Nov2023.pdf

You don't often get email from [redacted] Learn why this is important

Hello

Please find attached SANFL correspondence related to the GARP Discussion Paper consultation process.
If you have any questions in relation to this matter, please contact me on the details below.

Regards
Belinda

Belinda Marsh
Head of Infrastructure & Government Relations
Adelaide Oval | North Adelaide SA 5006
[redacted] | sanfl.com.au

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WEST END

6 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
Via email: plansasubmissions@sa.gov.au

To whom it may concern,

RE: Submission – Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to provide a submission on the Greater Adelaide Regional Plan Discussion Paper.

SANFL is passionate about creating fun, safe and inclusive environments that connect communities and allow all participants to thrive and pursue excellence. We demonstrate this commitment through our programs that are delivered to support people in community football across South Australia.

Over recent years, Australia has experienced a huge surge in women and girls participating in sports that were viewed as male only. For every female football team that existed in South Australia in 2010, there are now almost 17 teams! This has had an incredible impact on the way our clubs connect with their local community, the diversification of members in clubs and an offering to a whole new target market of people interested in football.

However, growth does have its challenges – the most significant of these being the availability of greenspace for participants to play and train.

With a current deficit of 14 ovals and a projected need for 37 more ovals by 2036, it is integral that we partner with state and local governments and other state sporting organisations to identify opportunities to unlock underutilised space and plan for functional, quality recreation space in growth areas.

Our sport significantly contributes to local community livability both socially and economically. A recent study found that community clubs contribute $1.73M to their local economy annually in addition to providing annual health benefits equal to $18,200 per participant, demonstrating the broad and often overlooked benefit football clubs have to their local community.

The attached paper provides an evidence-based overview on where we are now, our projected need, and some requirements that we believe must be considered when planning for future infill and greenfield growth.

We welcome the opportunity to discuss our submission in more detail with you and the State Planning Commission over the course of the Greater Adelaide Regional Plan consultation period. Please contact Belinda Marsh, Head of Infrastructure and Government Relations at [redacted] to discuss this further.

Yours sincerely

[redacted]

Darren Chandler
Chief Executive Officer

SANFL Overview

Formed in 1877, SANFL is a not-for-profit sporting organisation that's mission is to protect, lead, manage and deliver the promotion and development of Australian Football for the people of South Australia.

SANFL is affiliated to the national body, the Australian Football League (AFL), but is governed by the South Australian Football Commission and is the peak body for Australian Rules Football in South Australia.

While SANFL is predominantly recognised in the public domain as a state league Australian Rules Football competition, the organisation is responsible for the overall health, sustainability, and growth of the sport in South Australia. This includes promotion of the sport, facilitating opportunities for participants to engage in the sport via competition and program management, and support and education for affiliated competitions and clubs to increase their own capacity as organisations delivering Australian Football programs to communities.

53,463 total club participants	3594 Registered Coaches
11,062 Auskick participants	12,804 SANFL Juniors participants
27,479 at SANFL League Grand Final	2019 Registered Umpires
26 Community Football Leagues	272 Clubs

2022 SANFL Annual Report

The Value of Football

Football plays a significant role in our economy and supporting our health system. The more people we have playing sport (football in this case) the greater pressure we take off the health system. A SANFL commissioned report found that community football clubs deliver significant economic and social benefits to their communities.

Metropolitan Community Clubs contribute $1.73M per year in economic activity
Metropolitan Clubs support up to 7 full time equivalent jobs
Regional centre and small-town football clubs contribute an average $1.127 million and $838,000 respectively.
$18,200 in annual health benefits per participant (player and volunteers) to help prevent chronic disease and mental illness.

SANFL Community Club Socio-Economic Contributions Study – 2022

How do local football clubs contribute to the concept of "Living Locally"?

Community football clubs contribute greatly to their local communities supporting local needs and community connection, making them integral to any future planning – either infill or greenfield.

1. Community Engagement: Local football clubs often actively engage with the local community, organising events, and initiatives that bring people together. They provide a platform for people to connect, socialise, and build relationships with others in their local area.

2. Sense of Identity: Football clubs often become a source of local pride and identity. Supporting a local team fosters a sense of belonging and attachment to the community. It gives people a shared interest and a common topic of conversation, strengthening the local fabric.

3. Economic Impact: As reported in the 2022 *SANFL Community Club Socio-Economic Contributions Study,* local football clubs can have a significant economic impact on the community. They attract spectators and members from the local area and beyond, leading to increased visitation in local businesses such as restaurants, bars, and shops. This, in turn, boosts the local economy and creates job opportunities.

4. Volunteer Opportunities: Football clubs rely heavily on volunteers, providing opportunities for local residents to get involved and contribute to their community. People can volunteer as coaches, umpires, administrators, or in various other roles, helping to develop skills, build relationships, and give back to their local area.

5. Health and Wellbeing: Local football clubs promote physical activity and a healthy lifestyle. They provide opportunities for people of all ages and abilities to participate in sports, improving fitness levels and overall well-being. This can have a positive impact on the health of individuals and the community as a whole. As reported in the 2022 *SANFL Community Club Socio-Economic Contributions Study* metropolitan football clubs provide an estimated health benefit equivalent to $18,200 in annual health benefits per participant (player and volunteers) to help prevent chronic disease and mental illness.

6. Youth Development: Local football clubs are fantastic at engaging with youth (8-17years), a cohort often at risk of becoming disengaged with sport and community activities. Club football programs provide opportunities for local children and young people to develop their skills, learn teamwork, discipline, and leadership qualities. They also offer a positive and structured environment for young people to engage in constructive activities, reducing the risk of anti-social behaviour.

Current demand

Australian Football has experienced exponential growth in recent years largely driven by the increase in female participation.

Whilst this is a welcomed problem, the unprecedented growth has highlighted shortcomings in our existing football infrastructure. The various limitations include oval carrying capacity where over-use is resulting in poor oval surface quality; lack of female friendly facilities, even though venues are hosting female competitions; inadequate oval lighting provision that can be unsafe for training and matches; and poor provision of inclusive change rooms for all usage.

Currently all Adelaide Metropolitan regions (Eastern, Southern Western, Northern), the Adelaide Hills region and the Barossa Region are greatly exceeding the recommended field to player ratio (A benchmark of 175 registered players per field is recommended (7 teams x 25 players)).

SANFL Region	2019 participation	2019 field to player ratio	Existing number of fields (2019)
Eastern Adelaide	3239	324	10
Southern Adelaide	15265	449	34
Western Adelaide	5166	397	13
Northern Adelaide	13968	268	52
Adelaide Hills	5326	231	23
Barossa	2823	176	16

SANFL Infrastructure Plan 2022-2032

What do you see as the benefits and potential drawbacks of infill development?

Whilst we recognise the desire for all forms of urban infill and support regeneration of housing stock, it must be noted that the proposed areas of investigation, namely the east, west, north and south corridors beyond the CBD, have football facilities that are already experiencing issues as a result of being over capacity based on a field to player ratio benchmark of 175 registered players per field.

Case Study

The Plympton Football Club in the western suburbs has grown to almost 500 registered club players in 2023. The popular club brings people together, supports local families and businesses and creates a sense of connection. In 2022, Plympton Football Club was awarded the SANFL Juniors Club of the Year Award recognising excellence in club governance, development, and behaviour.

The multipurpose facility at Plympton Oval is landlocked and surrounded by medium density dwellings and will soon have an additional 400 residential dwellings developed by its neighbouring land Morphettville Racecourse.

Currently hosting football, soccer and cricket at the site, the built form facility does not meet contemporary needs including female friendly/child safe amenities, storage, lighting, spectator amenity and of greatest concern, a quality year-round playing surface.

A further increase in population in the surrounding areas will further contribute to the current squeeze.

SANFL is working closely with Plympton Football Club to source additional greenspace for them to train. Local school sites are the focus, but these are difficult to secure due to barriers including funding, planning requirements and schools just not allowing access.

Clubs surrounding Plympton are also at capacity (PHOS, Edwardstown, Glandore Oval) making the option to disperse participants difficult as well.

Based on the 2021 Census data and the projected populations for the Adelaide Western metro area (LGAs: Charles Sturt, West Torrens, Holdfast Bay, Marion) there is a potential increase of approximately 10,000 additional residents by 2036 just in the football targeted age cohort of 5-39years. With current penetration rates for male and female participants, this results in football having approximately an additional 700 players in need of quality facilities in this local area that, as demonstrated above, is already bursting at the seams.

Projected Demand

We know that we are already at a deficit for ovals in the Adelaide metropolitan area based on the industry benchmark (175 players per oval). Combine this with the most recent census data and population projections, we need a considerable amount of oval space to ensure the ongoing sustainability of our game.

The below table illustrates oval requirements across South Australia based on current, medium and high penetration ratios. The data reflects the NET number of ovals required across the State and takes into account Regional areas that are underutilised.

Ovals & Teams - 2022

2,321 Teams	318 Current Ovals	332 Req'd Ovals

Growth in Teams

	2026	2031	2036
Teams Same	+1	+1	+1
Teams Med	+145	+191	+228
Teams High	+369	+419	+460

Oval Requirements

	2026	2031	2036
Ovals Same	+26	+32	+37
Ovals Med	+34	+41	+46
Ovals High	+66	+74	+79

**Calculated based on 25 players per team and 7 teams per oval*

The below table illustrates the GROSS number of ovals required in independent local government areas and provides a more concerning position.

LGA	Current ovals	Total required ovals by 2031
Onkaparinga	16	32
Tea Tree Gully	5	19
Charles Sturt	10	22
Marion	7	18
Salisbury	9	17
Pt Adelaide Enfield	13	16
Unley	2	8
West Torrens	5	11

Greenfield development

The proposed greenfield development locations are commensurate with our identified growth areas, particularly northern Adelaide areas of Light Regional and Adelaide Plains Councils.

Australian Rules Football is extremely popular with residents in Light Regional Council. They have double the state average for Auskick participants and almost double the state average for community club participants. With further development planned in this area, we propose that sport and recreation is strongly considered, particular AFL standard size oval space.

What do you see as the benefits and potential drawbacks of greenfield development?

Greenfield development opportunities provide a blank canvas for comprehensive planning and design. It allows for the creation of well-designed, integrated communities with carefully considered infrastructure, amenities, and open spaces. This can result in more efficient land use, improved connectivity, and enhanced liveability for residents.
SANFL sees opportunities in these areas to grow existing clubs and to introduce new clubs to provide a sustainable future for our sport whilst enabling the Living Locally concept.

Case Study
City of Casey - Casey Fields
The City of Casey is one of Australia's fastest growing regions. Exceptional planning and partnerships have ensured that the City meets recreation and liveability needs of its new residents.
In less than two decades, Casey Fields has grown from 87-hectares of farmland to a complex boasting more than 30 fields, tracks and courts for professional and community sport. Supporting the development is a dedicated train station proposed as part of the future Clyde Rail extension. Casey Fields is one of Melbourne's prominent regional sporting facilities. The scale and status of the site provides the ideal setting for elite sport and major events that attract visitors, bring Casey residents together and create a more prosperous and resilient economy. Local pathways are also provided into higher levels of sporting competition for a diverse community. Casey Fields is unique as an elite-level precinct, whilst being open and accessible to the public for their own recreational pursuits. The sum of offerings at Casey Fields results in a healthier, more inclusive and more connected community.

GARP considerations

Access and investment into school ovals

School sites provide the best opportunity for sporting organisations to become sustainable and meet the demand on population growth. They are vacant during the hours needed for sports (4-8pm weekdays and during the day on weekends) and have existing amenity to meet football needs such as changerooms, toilets, shelters and some carparking.

However, significant barriers exist to co-location at these sites.

- Accessibility is dependant upon the approval of the School Principal. Where Principals are not open to discussions, vacant greenspace remains underutilised.
- Investment into the site must be made into these facilities to ensure they can be utilised fully. This includes oval lighting and an increase in turf maintenance, including irrigation upgrades. Long term user agreements are necessary to unlock funding opportunities. School budgets are particularly difficult to access for this purpose, as are Local Government funds as schools are usually on State Land. Sport can not fund and maintain these facilities alone and a co-contribution model is required.
- School sites need to be included in the Local Government Open Space and Recreation Plans so that their benefit can be maximised by the community. The City of Playford has recently been successful in including Playford International College in their Open Space planning and have delivered a lighting project on the school oval to support local football. It is an exceptional example of various stakeholders working together and fully utilising existing amenity.

Some excellent recent examples where co-funding models have delivered benefits for schools and sports include Henley High School, Cardijn College and as mentioned above, Playford International College.

Support for Growth Councils

It is acknowledged that most open space and recreation needs in new greenfield developments will be the responsibility of the local government body. With resources thinly spread at this level of government, support needs to be provided to ensure greenfield sites are liveable and offer recreation activities for local residents. We have identified some examples of how interstate governments have supported growing suburbs for your consideration.

VIC Country Football Netball program

This program is open to LGAs only and has different ratios of funding available depending on the location of the LGA. This supports the growth suburbs to develop recreation facilities for active sports.

Funding available	Local Government Authority (LGA)	Funding Ratios
Up to $250,000**	**Rural LGAs**	SRV $3 : $1 local
	Regional/Interface LGAs Ballarat, Greater Bendigo, Greater Geelong, Cardinia, Casey, Hume, Melton, Mornington Peninsula, Nillumbik, Whittlesea, Wyndham, Yarra Ranges	SRV $2 : $1 local
	Metropolitan LGAs Greater Dandenong, Kingston, Frankston** *Only clubs competing in leagues affiliated with AFL Victoria Country are eligible to receive funding*	SRV $1 : $1 local
**Applicants may claim in-kind expenses to a maximum of 50 per cent of the total project cost.		

Growing Suburbs Fund

The Growing Suburbs Fund supports LGAs to build the facilities needed to support healthy and liveable communities in Victorias fastest growing suburbs. The Growing Suburbs Fund (GSF) provided an investment of $425 million over 8 years between 2015-16 and 2022-23 in critical local infrastructure in Melbourne's diverse and fast-growing outer suburbs including multi-purpose sports pavilions inclusive of changerooms, storage, medical rooms and social areas.
Since its establishment in 2015, the Growing Suburbs fund has supported 346 projects representing a total infrastructure investment of $1.227 billion and has created over 11,340 jobs.

References

- 2022 SANFL Annual Report
- SANFL Community Club Socio-Economic Contributions Study – 2022
- SANFL Infrastructure Plan 2022-2032
- AFL Tableau – Participation and Ground Forecasting - October 2023
- Victoria Country Football Netball Program - https://sport.vic.gov.au/grants-and-funding/our-grants/country-football-and-netball-program
- Growing Suburbs Fund - https://www.localgovernment.vic.gov.au/grant /growing-suburbs-fund
- Casey Fields - https://www.casey.vic.gov.au/managing-our-growth
  And https://www.casey.vic.gov.au/casey-fields

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 2:34 AM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: SWWAN-Proposal-For-a-Resilient-Future-GARP-Review-2023.pdf; Impact-of-Airbnb-on-Adelaide-Rental-Market-SWWAN-2023.pdf; Inadequate-Urban-Canopy-Cover-Targets-SWWAN-Oct-2023.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Community Group
Given name:	Matthew
Family name:	Farrell
Organisation:	Sellicks Woodlands and Wetlands Action Network (SWWAN)
Email address:	sellickswoodlands@gmail.com
Phone number:	[redacted]
Comments:	SWWAN are making three submissions to the GARP Review. 1. Major Submission - Proposal for a Resilient Future. A proposal to reverse biodiversity loss, address climate change and fix the housing crisis in the Fleurieu Peninsula. The projected need for housing is overstated and the need for environmental restoration to protect agriculture and our food security must take precedence. We ask the State Government to end all greenfield housing developments and embark on an ambitious plan to save biodiversity in the Mount Lofty Ranges by rewilding the Fleurieu Peninsula. 2. The Impact of AirBnB on Adelaide Rental Market. AirBnB represents 69% of vacant houses in the Adelaide rental market. We use the same data Victoria used to set their Airbnb tax to show the significant impact short term rentals are having on vacancy rates. We don't have a housing crisis, we have a rental crisis. Small changes in policy to curtail short term rental financial advantages and encourage a shift to long term rentals by landlords will have an large and immediate effect on vacancy rates. 3. Inadequate Canopy Cover. Councils around Adelaide have set dangerously low 2045 canopy cover targets because of a misinterpretation Target 5 of the Greater Adelaide Plan in 2018 resulting in targets 60-90% below urban planning health recommendations. All councils have significantly underspent on tree planting over the last five years putting all Greater Adelaide residents at a highly elevated risk of heat related illness in the coming years. This must be dealt with urgently.
Attachment 1:	SWWAN-Proposal-For-a-Resilient-Future-GARP-Review-2023.pdf, type application/pdf, 2.1 MB
Attachment 2:	Impact-of-Airbnb-on-Adelaide-Rental-Market-SWWAN-2023.pdf, type application/pdf, 83.8 KB
Attachment 3:	Inadequate-Urban-Canopy-Cover-Targets-SWWAN-Oct-2023.pdf, type application/pdf, 1.3 MB
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

Sellicks Woodlands and Wetlands Action Network (SWWAN)

Submission to Greater Adelaide Region Plan Review
6th November 2023.

SWWAN was founded in 2020 to oppose greenfield housing developments in the Sellicks Beach area and to advocate that the land instead be conserved for environmental restoration as an essential response to the extinction crisis.

In support of this we present an evidence-based plan for the wider region of the Willunga Basin and Fleurieu Peninsula that addresses the existential threats to South Australia of biodiversity loss and climate change, protects our agricultural industries and addresses the housing crisis. Our plan respects the cultural significance of the land. SWWAN consider the healing of Country as an essential part of reconciliation.

Since the last update of the 30-Year Plan Greater Adelaide Plan (30-Year Plan),
our world has changed significantly and the knowledge of the threats posed to us by biodiversity loss and climate change have expanded greatly. The environment is collapsing because of biodiversity loss and the effects of climate change are being felt across the world. The need for housing is no longer, and hasn't been for some time, on the peri-urban fringe of Adelaide but in sustainable urban infill closer to the city centre with a priority on social housing.

As a significant measure against biodiversity loss in the Mount Lofty Ranges region, SWWAN proposes that the South Australian Government partner with community and stakeholders over the next decade to create the Willunga Basin Coast Conservation Park as part of a larger program over the next two decades to Rewild the Fleurieu and reverse the extinction crisis. We strongly urge the state government to undertake this project for the benefit of all South Australians.

Sincerely,
The SWWAN Committee.

SWWAN'S PROPOSAL FOR A RESILIENT FUTURE

REWILD THE FLEURIEU &
THE WILLUNGA BASIN COAST CONSERVATION PARK

SWWAN propose that in response to the existential threat posed by biodiversity loss to our agricultural industries and jobs, our food security and future, that the Willunga Basin coastline be protected from further urban development and that the Willunga Basin Coast Conservation Park, following the Tjilbruke Dreaming Trail, be created from Maslin's Beach to Sellicks Hill as part of a wider Rewild the Fleurieu project to protect the Willunga Basin food bowl and ensure a productive and resilient Fleurieu. This potentially could also be achieved by extending the McLaren Vale Preservation District to the coast.

We propose the Willunga Basin Coast Conservation Park as a continuous conservation zone protecting the last open space on the metropolitan coastline and the only place where the hills meet the coast. The park will extend South from Maslins Beach between South Road and the coast, wrap around the existing townships of Port Willunga, Aldinga, and Sellicks Beach, buffer the Aldinga Scrub and Washpool Conservation Park, and climb up to a restored eucalyptus grassy woodland that would have once overlooked Sellicks Beach. (Figure 1 next page)

Our vision is that this new conservation park could one day connect north to the Onkaparinga National Park, and south along the Fleurieu Coast through to Cape Jervis as part of a larger Rewild the Fleurieu project. The establishment of the Willunga Basin Coast Conservation Park would create a unique conservation park that would cover several significantly different ecosystems and land types and their transitional zones. The park will contribute to the protection of productive and cultural landscapes and increase biodiversity in the wider Willunga Basin. It will keep the enclosed urban areas cooler, build resilience into our local agriculture industry, create diverse tourism opportunities and jobs in the area and maintain the current residents' quality of life.

By restoring the Willunga Basin coast's native vegetation, we will be contributing to preserving biodiversity in the area and the ecosystems we rely on for food, clean air and water. In doing so, we will not only help restore our environment and save species from extinction, but we will grow our economy, make our community more resilient, healthier, and better prepared for the problems associated with climate change.

Figure 1. Mud map of the proposed area of the Willunga Basin Coast Conservation Park. Incorporating the townships of Port Willunga, Aldinga, Aldinga Beach and Sellicks Beach, and the Aldinga Scrub and Washpool Conservation Park.

The Issue

BIODIVERSITY LOSS

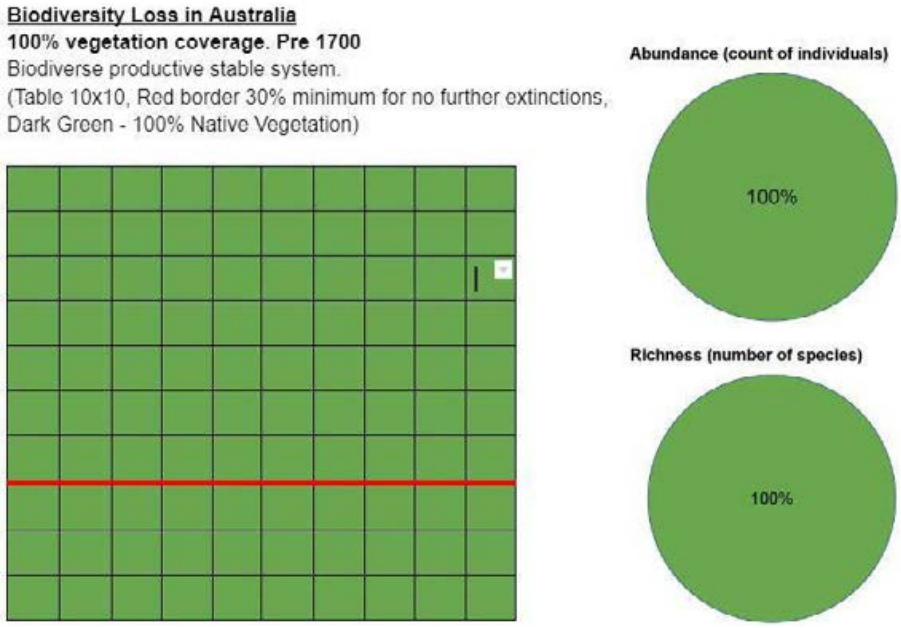
The extinction crisis is the biggest threat to the future of South Australia. The predicted collapse of the environment in 50-80 years time will devastate our agricultural industries, threaten our food security and is irreversible. The evidence for species loss and the threat posed by ecosystem collapse is overwhelming and addressing it must be a priority for all governments.

Biodiversity loss and the extinction crisis are driven by a lack of resources because of centuries of clearing habitat for our cities and farms. Biodiversity loss is commonly confounded with climate change but the key driver of biodiversity loss is the historic clearance of more than 90% of habitat across the arable regions of Australia.

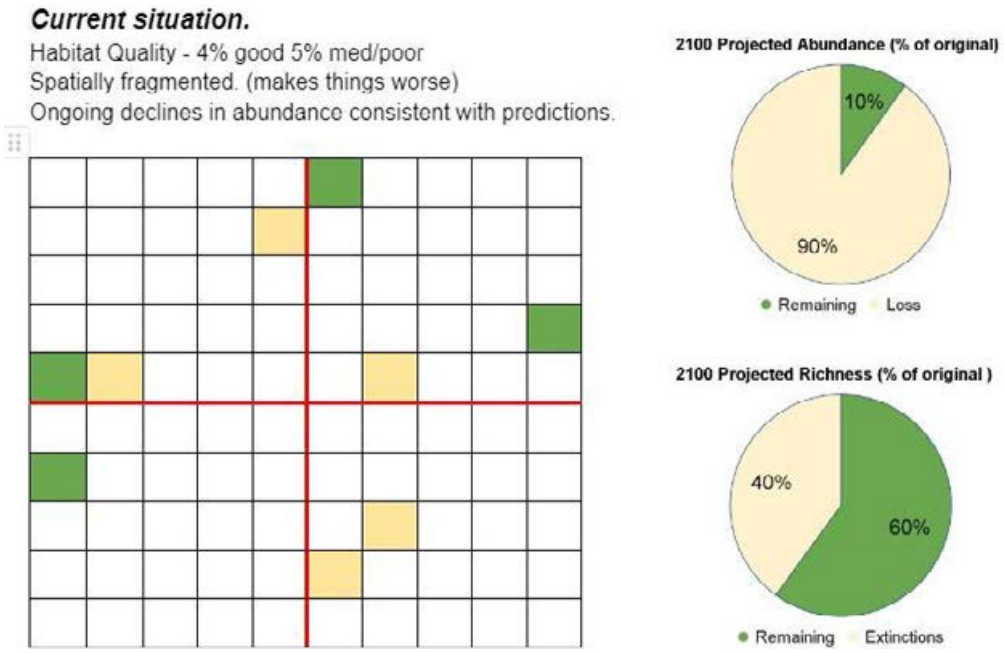
This loss of habitat represents a shortage of food, shelter, hiding places, escape routes, places for mating and raising babies, which over time results in population declines and eventually extinctions. In economic terms we have overspent our natural capital and now owe a significant extinction debt. Climate change will make this worse but solving climate change won't fix these problems.

Figure 2 Aldinga Scrub looking southeast from the dunes lookout.2021.

A quick ecology lesson.



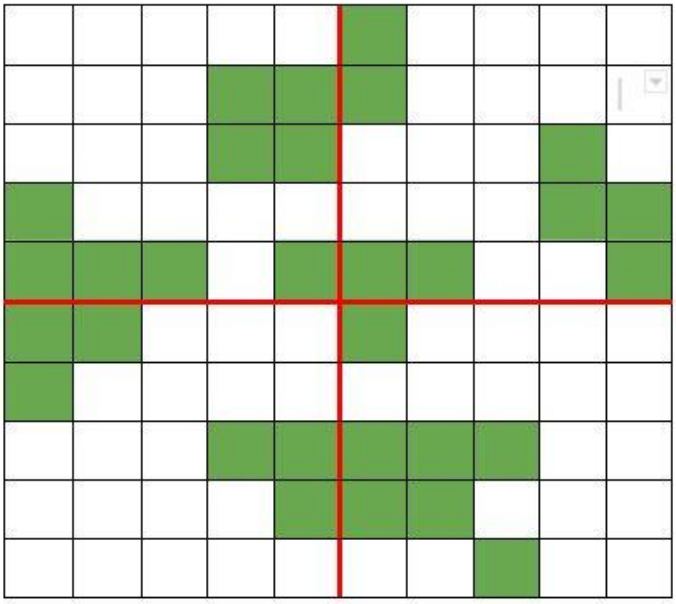
Since colonisation we have cleared approximately 90% of our natural capital and we now owe a significant extinction debt. There is a long temporal delay, 50-80 years at current rates of decline, between the loss of habitat and the decline of faunal populations to meet the new resources level. If allowed to reach this level we will see 30-50% of species go extinct by 2100. This is the extinction debt we owe[1].

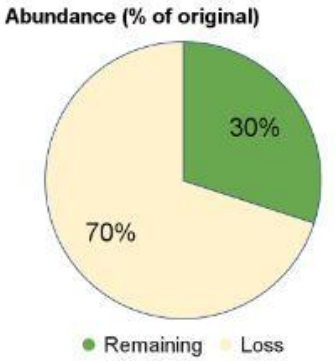


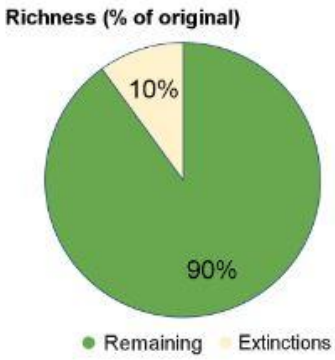
[1] *2017 SA Gov Environment Resources and Development Committee* 53rd Parliament, Environment Resources and Development Committee Completed Enquires Report 78/ Biodiversity.28/03/17

We can pay the debt in extinctions or invest now to rebuild nature before the debt is due.

Goal. Needed to prevent ecosystem collapse.
Greater than 30% contiguous, good quality, heterogeneous habitat.
Achievable in 25-50 years.







The temporal delay means we have a window of opportunity to restore habitat to the 30% minimum required for no further extinctions. The scale of the work required is considerable. Within the Mt Lofty Ranges 150,000 hectares of new restoration are required, or over a century of work at current rates[2]. This can be scaled up to achieve the target in the time frame required of the next 50 years, but we must start now by protecting farmland from greenfield development and prioritising broadscale restoration programs commensurate with the scales required.

The map of the Willunga Basin (next page) shows how only (9%) native vegetation is left and located on the edges of human use. Additionally the habitat is highly fragmented and in poor condition due to invasive weeds. To maintain functioning ecosystems to provide us with food, we need habitat coverage of at least 30% throughout the landscape[3] of contiguous, good quality, diverse habitat. Below this we will continue to see declines and extinctions and be impacted by the effects. Protecting the 10% left is not enough.

[2] *BioR Strategic Plan 2023-2028 From Cleared Lands to Woodlands BioR accessed Aug 2023.*
[3] *UN 30x30; Koalas, parrots, frogs and orchids share our cities. It's key to protect each one's habitat, not just 30% of all land Simon Kilbane, The Conversation, Nov 2023.*

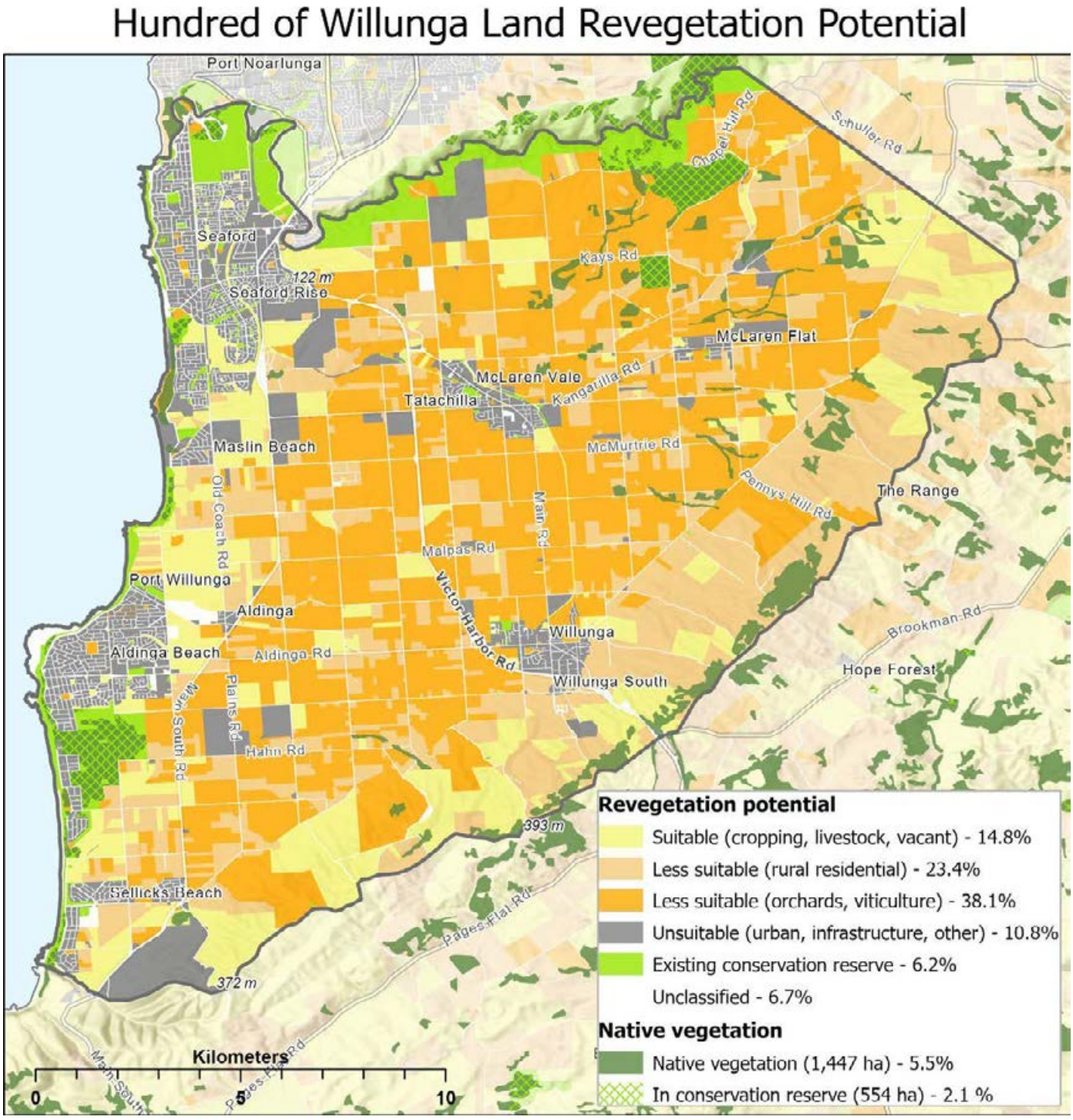


Figure 3. Land use map of the Willunga Basin. I Ahmer, University of Adelaide, Dec 2023 for SWWAN.

Benefits

The prevention of further extinctions by restoring the environment will have widespread benefits in the future beyond this primary goal. These include;

Agriculture and Food Security

Farmers from the largest vineyard to the smallest backyard garden in the Willunga Basin will benefit from the restoration of a coastal vegetation buffer and the ecosystem services it will provide. By protecting biodiversity, we will ensure our agricultural community is resilient and better prepared for the future. The most obvious benefit to farmers is the protection of pollination services.

Nearly three quarters of all major crops, representing a third of the world's food supply, are dependent on pollinators[4]. For some crops, such as watermelon, almonds, apricots and cherries, pollinators are essential, others, like strawberries, tomatoes, oranges and many oil crops, will be adversely affected in quality and quantity[5]. Native wildlife also provide important pest control services. A study by R Paisley (2017) from Charles Sturt University showed that the presence of native vegetation close to agriculture has a net positive effect with a 10-20% premium in productivity over sites without nearby vegetation[6].

A loss of ecosystem services will be calamitous for the agricultural sector particularly society in general. To ensure the resilience of our food supply, our agricultural economy and the jobs that go with it, we must treat the environment as the irreplaceable asset it is and act now to repair it before it's too late.

Economic

While the economic gains from urban construction will quickly pass, the jobs and indirect stimulus for the local economy created by undertaking a generational restoration project of this size will last decades. Every worker becomes a customer when they knock off.

Aside from the direct economic stimulus of the restoration work, the creation of a conservation park along the Willunga Basin coast will provide long term benefits to many other industries, particularly tourism and retail. The benefits to local agriculture will be substantial through ensuring the resilience of the industry to continue operating, employing people, and providing a

[4] *Ecosystem collapse 'inevitable' unless wildlife losses reversed | Biodiversity | The Guardian* *D. Carrington 25.2.2023*
[5] *H Ritchie 2021. How much of the world's food production is dependent on pollinators?*
[6] *Peisley, R. (2017). The benefits and costs of bird activity in agroecosystems. [Doctoral Thesis, Charles Sturt University]. Charles Sturt University.*

great product. Tourism will be a huge winner from restoring the environment and the overall economic stimulus will in turn create more jobs in the service, retail and other industries.

Community Health

The existing communities of the Willunga Basin will benefit from the cooling effect of the trees, reduced pollution, and most importantly, reduced risk of heat related health problems associated with urban heat in the future, which is recognised as a significant health issue. The value of nature to the economy is currently estimated in the $100s of millions in avoided healthcare costs[7]. This will be even more important in the coming decades, and it is imperative we act now to make our communities climate ready communities to avoid the associated social and financial costs[8].

Cultural Values

The area is on the lands of the Kaurna nation and the Tjilbruke Dreaming Trail passes through the entire area from North to South. This Dreaming story is a very significant story in Kaurna culture and there are a number of significant cultural sites in the area. The creation of the Willunga Basin Coast Conservation Park is an opportunity to continue reconciliation of our history through restoring Country.

Tourism

Imagine if instead of Lonely Planet making Kangaroo Island the 2nd best place to visit that it was the whole Mount Lofty Ranges. In a generation it could be. The creation of a new conservation park on Adelaide's southern metropolitan coast linking to the parks of the Fleurieu will be a massive boost to tourism state-wide and a valuable diversification of the local market heavily dependent on the wine industry. Hiking, birdwatching, and other outdoor activities will create jobs and economic activity both directly and indirectly. As an example of the economic opportunities available, more people went bird watching in Australia than visited the Great Barrier Reef in 2019[9] and in the United States birdwatching is worth $41billion annually[10].

Education and Research

Restoring the 90 hectares of land between Aldinga Payinthi College and Aldinga Beach Road, currently under cropping and previously earmarked for housing and infrastructure, would be a

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[7] SA outdoor economy Marsdon-Jacon 2020 Avoided Healthcare costs p2

[8] WHO Climate Change and Health Fact Sheet

[9] Courier Mail bird-watching-is-taking-flight

[10] Daily Beast Withrow (2019); Schwoerer T, Dawson NG (2022) Small sight—Big might: Economic impact of bird tourism shows opportunities for rural communities and biodiversity conservation. PLoS ONE 17(7): e0268594. https://doi.org/10.1371/journal.pone.0268594

unique long term environmental educational opportunity for the new high school. Students from R-12 could be involved in all aspects of restoration, preparing many for careers in environmental science and all gaining a greater appreciation for our natural environment.

The need for greater research into understanding ecological restoration is constantly cited in academic papers on the subject. The large scale of this proposal in general and its proximity to metropolitan Adelaide will provide researchers from our universities and around the world with a unique study site to further restoration science and help save the world.

Other issues

There are a number of other issues to be considered in this discussion aside from the threat of biodiversity loss which we address here. We must consider the declaration of the Climate Emergency and what measures are needed to protect our communities from the health risks of climate change, particularly urban heat. What is the cause of the housing and rental crisis and what are the best solutions? We also consider landholders rights and propose options to cover a variety of scenarios as well as the question of anticipated returns on investment for developers and land bankers.

CLIMATE CHANGE

The South Australian Government has declared a “Climate Emergency[11] in response to the global need for action. In the ‘State of the Climate 2022’[12] Report, the Bureau of Meteorology (BOM) stated that Australia’s climate has warmed by an average of 1.47 ± 0.24 °C since national records began in 1910. The International Panel on Climate Change (IPCC)[13] warned us that even if all countries meet current emission reduction pledges, the world is still on track to exceed 2℃ of warming.

While much of the discussion on how to deal with the climate crisis centres on the environment and economics, the biggest threat to individuals and communities are the health risks associated with a warming planet. Climate change poses risks to health through increased risk of heat related health issues, increased risk to pollution-related illnesses and mental health issues[14]. There is the risk to the lives of people through catastrophic weather events such as the

[11] South Australian Climate Emergency Declaration
[12] State of the Climate 2022 BOM
[13] IPCC Report on Climate Change
[14] WHO Climate Change and Health Fact Sheet

Black Summer bushfires and the recent floods, the increased risk of disease and the loss of food and water security[15].

Restoring the natural environment is one of the best ways to act on climate change. Plants draw down carbon from the atmosphere and the restoration of natural environments will keep our communities cooler and reduce the health problems associated with climate change. Aside from being essential to the ongoing viability of agriculture, native vegetation will build resilience into these industries already experiencing declines in productivity from a warming planet. In recognition of this, all levels of government have acknowledged the need to plan for a changing climate, and have policies and initiatives in place to help prepare our communities. We have a responsibility to prioritise these initiatives in the Greater Adelaide Regional Plan..

HOUSING CRISIS

Outdated urban expansion plans do not address the causes of the housing crisis, the rapidly changing needs of our modern world nor the needs of the future. Continued urban expansion will limit our ability to restore the environment to the minimum levels needed around our agricultural areas. The housing crisis is not founded in the need for new homes, it is a lack of affordable long term rentals that is driving the exponential rise in homelessness.

Holidays or Homes

The effect on supply of the short-term rental and holiday market as it has grown over the last decade is often overlooked in housing discussions. Table 3 compares the number of vacant properties and those listed on AirBnB[1617]. The figures show that over two thirds of vacant houses in the Greater Adelaide area are reserved for holidays instead of homes. In Aldinga, where the rental crisis is being felt acutely, the ratio of Airbnb to available rentals is over 9 to1.

Table 1 Comparison of advertised rental properties examining the impact of short term rentals in Aldinga SA@, the City of Onkaparinga and Greater Adelaide.

Vacant Dwellings (March 2023)	Aldinga SA2	City of Onkaparinga	Greater Adelaide
Rented properties	1,509	15,402	152,198
Vacant Rentals	24	258	1,309
Air BnB Listed Dwellings	252	564	2,972
Total Vacant Dwellings (Lng+AirBnB)	276	822	4,281
AIrbNB % (AirBnB/Total Vacant Dwellings)	91.3%	68.6%	69.4%

[15] *WHO Climate Change and Health Fact Sheet*

[16] *RealEstate.com.au – Search for vacant rentals 29/07/23*

[17] *Inside AirBnB, www.insideairbnb.com , data provided by Liss Ralston, Inside AirBnB, June 26 2023*

The government's plan to address the housing crisis by building more houses is targeted at the wrong sector of the market. Our housing crisis is due to a shortage of rental homes and this is where the government should act. While incorporating more social and affordable housing into future developments will help in the future, families cannot live in their cars for years waiting. Encouraging landlords to switch to long-term leases as a priority will reduce the number of families in difficulty right now.

Short-term rental advocates will argue as to the economic benefits brought by the service they provide. The counter argument to this is to consider an equivalent number of families living in these homes contributing not just economically but becoming part of these communities. The economic benefits would also be felt in a reduction in demand for crisis services and other social support services associated with the rental crisis we are currently experiencing. There would also be a reciprocal benefit to hotel and motel operators throughout Greater Adelaide.

The desire of landlords for greater financial returns has been the main driver of the switch from long-term to short-term rentals over the last decade. To reverse the rental housing crisis, it is important to address the financial incentive directly. Here are a number of ways that this could be done.

Council Rates: (both together)

- Increase council rates of short-term rentals to commercial hotel rates. Rates should be set on the use of the building, not its shape.
- Discount rates for landlords offering long-term leases.
    - e.g., 1 year - 10% off, 2 years - 15% off, 3 years – 20% off.

State:

- Set limits on the number of days a property can be used for short-term rentals.
- Consider a land tax to replace stamp duty to increase the ongoing costs on vacant properties.
- Increase safety compliance on short-term rentals to commercial hotel standards. Safety should be based on use, not the shape of the building.

<u>How many houses?</u>

The most recent population projections to 2051 say that at the highest population growth scenarios Greater Adelaide’s population could grow by 672,000 people and require 300,000

new homes by 2051. This growth is unexpected though and the expected growth pathway is for the medium growth scenario of 489,000 people and a need for 218,000 new dwellings[18].

Between 2016 and 2021 South Australia had built 52,000 dwellings and the population increased by 79,000[1920]. This results in approximately 17,000 homes more than required than in the highest population high growth models. Plan SA states on its website there are 139,000[21] homes already approved, these are enough to cover the highest population growth to 2036 at an occupancy rate of 2.24 people per dwelling. (Note: This figure used by the government is considerably lower than the 2021 census which puts the figure at 2.4)[22].

In the most likely growth scenario of medium population growth these already approved homes are enough to cover population growth past 2041 and only a further 79,000 dwellings are required to house population growth past 2051 (Figure 4, next page). This can easily be achieved through urban infill and strategic infill over the next 30 years.There is no need for greenfield development.

This analysis shows that the release of new land for development at Sellicks Beach, Aldinga and Hackham is not necessary as there is already enough development in the pipeline to employ builders for the next 14 years and cover expected population growth beyond 2041 without resorting to greenfield development. On the other hand it is imperative that we begin work on restoring the environment as soon as possible given the scale of the problem and the time forests take to mature.

The GARP discussion paper correctly identifies urban infill, strategic infill and urban corridor development as areas where significant opportunity for housing exists. The numbers expected to be achieved through these measures in the future is not accounted for in the GARP discussion paper but will contribute to increasing the housing supply with greater choice, density and amenities than greenfield housing and at a lower cost to the government.

As dwelling construction has been outpacing population growth requirements since 2016 and will continue to do so even under the highest growth projections, the housing crisis is not a result of a lack of new housing supply. This supports our conclusions that short term rentals affecting long term rental availability is the real cause of the housing crisis.

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[18] *Population projections | PlanSA accessed Sept 2023*
[19] *ABS Building Activity South Australia accessed Sept 2023*
[20] *Recent population change | PlanSA accessed Sept 2023*
[21] *Plan SA Residential-land-release-and-rezoning accessed Sept 2023*
[22] *2021 Adelaide, Census All persons QuickStats | Australian Bureau of Statistics accessed Sept 2023*

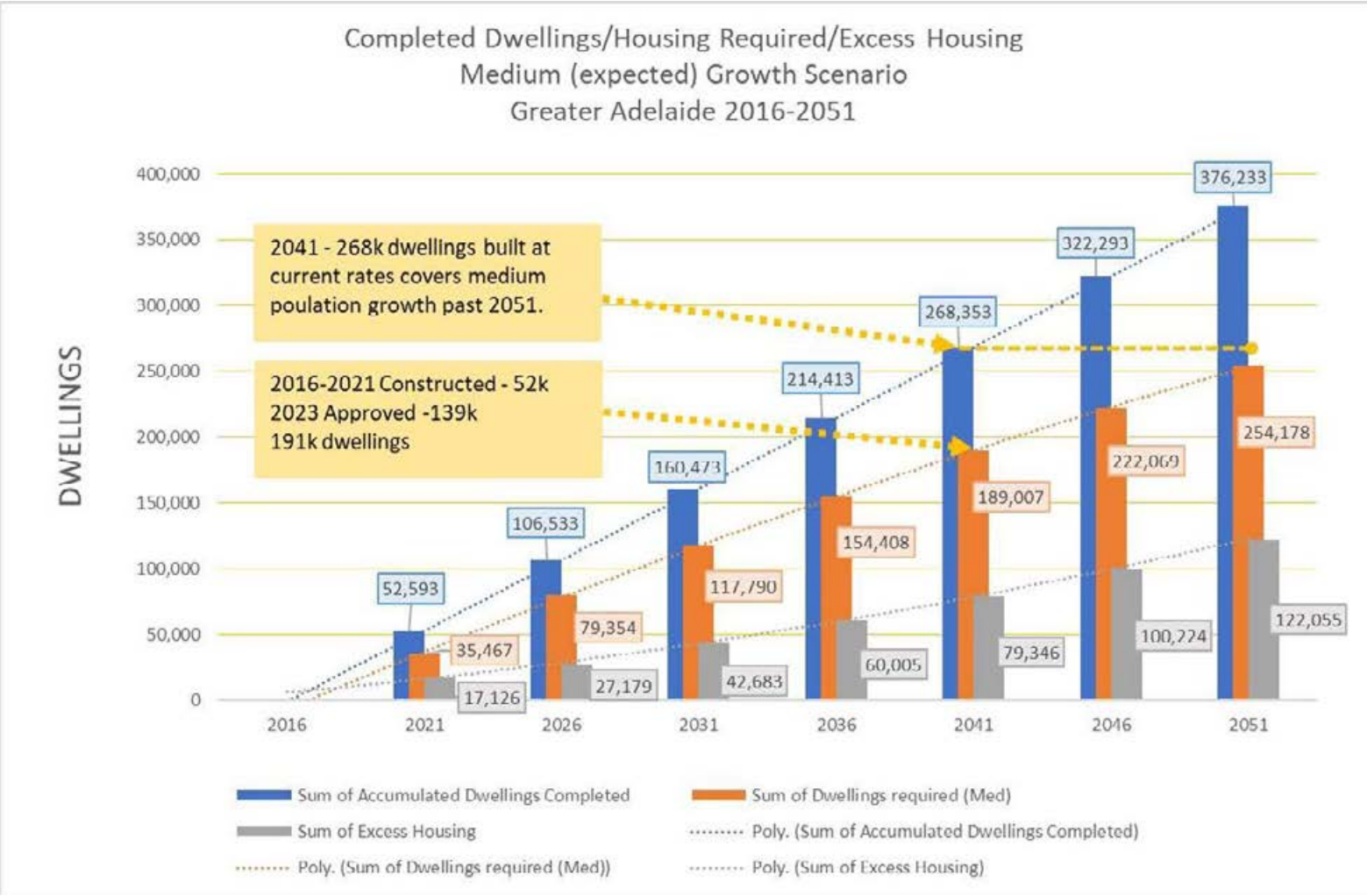

Figure 4. Chart showing data from 2016-2051 of completed dwellings and projected dwelling completions (blue), actual and expected population growth of Greater Adelaide expressed as the number of dwellings required at 2.24 persons per dwelling (orange) and excess houses (grey) as a result of construction outpacing population growth. Data uses Plan SA Population growth figures and ABS Construction statistics 2016-2051. Dwelling construction per year was set at 10,788, the average for the period 2016-2021.

Urban infill

The latest urban development policy research shows that the most beneficial new housing for South Australia will come from medium density infill[23], in established suburbs with infrastructure capacity[24], with a priority on social housing linked to services and infrastructure[25]. This is where we should be prioritising our housing plans. In addition to plans for increased urban infill, strategic infill and urban corridor development, opportunity for further densification of suburbs will come as Adelaide's population becomes older and downsizes large homes in the low density areas.

Greenfield housing is more expensive to society. A literature review and a case study of major development sites in Bowden and Playford Council by Cathryn Hamilton and Jon Kellett (2017)[26] found the costs associated with infrastructure provision to the bowden infill development site was one third the cost of Playford Councils greenfield sites.

Another study, Design Perth[27], made similar findings and additionally provided estimates of the extra transport costs due to longer commute times, extra car ownership and use, and parking costs that fall on individual householders and the broader economic costs to the environment, health and productivity of greenfield housing. These all showed a significant greater ongoing cost for individuals and society associated with greenfield housing when compared to infill.

Despite these findings there is resistance on the part of the development industry to follow current urban growth policy. Hamilton and Kellett (2017) suggest there is some evidence that the developer's construction costs can be higher in infill situations, and hence lower profits, which may explain this. We ask that the government show leadership and plan for our communities future rather than the current plans which put developers retirements first.

[23] Planning to Prosper | Urbis p71
[24] Cathryn Hamilton & Jon Kellett (2017) Cost comparison of infrastructure on greenfield and infill sites, Urban Policy and Research, 35:3, 248-260, DOI: 10.1080/08111146.2016.1274257 p259
[25] ABC News Jul 2022 South Australian Public Housing Shortage
[26] Cathryn Hamilton & Jon Kellett (2017) Cost comparison of infrastructure on greenfield and infill sites, Urban Policy and Research, 35:3, 248-260, DOI: 10.1080/08111146.2016.1274257 p258
[27] Design Perth 2017 p51

LAND OWNERSHIP AND STAKEHOLDER ENGAGEMENT

The land proposed for the Willunga Basin Coast Conservation Park is owned by government, private owners, businesses and investment companies. SWWAN is proposing several options for collaboration between all stakeholders to facilitate the creation of the park.

We propose that all government owned land be transferred to the Department of Environment and restoration work begun immediately. Another option for government owned land is for ownership to be transferred to the Kaurna Nation.

Where land is suitable for restoration but owned privately, options could include, but are not limited to:

1. Sale – The land is bought outright by the government for a fair price and transferred to the Department of Environment as custodian of the land.
2. Sale with option to stay – Owners sell the land to the government for a lesser amount and are given an ongoing paid role in the restoration of the land. This will allow owners who live on the land to stay on their property and be a part of the project. [a]
3. Partnership – Partner with Government or third-party organisation to remain in possession of the land and undertake the restoration works themselves. [a] [b]
4. No immediate restoration – This option is particularly applicable for land currently used for vineyards and orchards where owners may want to continue to operate their businesses while the park is built around them. [b]

[a] In options 2 & 3 training and certification in Conservation and Environmental Management could be offered in some form.

[b] In options 3 & 4, though the owners retain ownership, the only option for eventual sale is to the government for the conservation park.

LAND VALUE and INVESTMENT

All investments come with risk. Sometimes it is high, sometimes low, but there is always risk involved in speculation. Speculators have invested in the land along the Willunga Coast, and in particular around Sellicks Beach and Aldinga, for decades in the hope of profiting from the area's eventual urban development. Unfortunately, during the last several decades, the world has changed, and so too has society's needs for the future.

The need for restoration and action on biodiversity loss is paramount and must take priority over unnecessary development for the sake of future communities. The housing needs projected last century, even last decade, that these investors banked on are no longer here (if they ever were)

and are now closer to the city. Unfortunately for these investors the risk has been realised. The situation has changed and a changing world and the greater need for the land, restoring biodiversity, should preclude any further greenfield development in the Willunga Basin..

Although the expected profits associated with securing the land for development will not be realised, landowners have many options to secure a fair return. Sale to the government for establishment of the conservation park will be at a fair price. Options to stay can come with returns from Carbon Credits and other income opportunities. The only option no longer on the table is urban development.

THE COST

We have not costed our proposal for the Willunga Basin Coast Conservation Park or the wider Rewild the Fleurieu proposal because whatever the cost will be to restore the environment, it will be less than the cost of losing everything if we don't act on a big enough scale, in enough time or if we don't act at all.
Our proposal is ambitious, but we are only asking for what is needed.

Conclusion

SWWAN's proposal to prioritise ecological restoration in the WIllunga Basin provides Governments at local, State and Federal levels an opportunity to create a future-ready, sustainable community and an opportunity to demonstrate their environmental and climate credentials to Australia and the rest of the world. Our evidence-based proposal offers a major contribution to ensuring no further extinctions in South Australia and protecting our future food security. Our plan also addresses some of the health and economic problems associated with climate change that our communities will face. The creation of the Willunga Basin Coast Conservation Park will protect and restore the Tjilbruke Dreaming Trail which is of significant cultural importance to the Kaurna Nation and will enhance the quality of life of all current and future residents.

For the future of the Willunga Basin and South Australia, the Sellicks Woodlands and Wetlands Action Network, on the behalf of all South Australians, urges the Government of South Australia to adopt SWWANs proposals to create the Willunga Basin Coast Conservation Park and Rewild the Fleurieu to restore biodiversity as part of the new Greater Adelaide Regional Plan.

Sellicks Woodlands and Wetlands Action Network

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SWWAN Coordinator and Author

Matt Farrell

We Have a Rental Housing Crisis

We don't have a housing crisis, we have a rental crisis. There are lots of homes for sale for anyone with the money. There are very few rental homes available no matter how much money a person has.

The crisis in rental housing is due to severe lack of availability with historically low vacancy levels, which has driven massive rent increases. Vacancy rates around 3% are considered healthy with a balance between renters and landlords. Vacancy rates below 2%, as we are seeing across Australia, signify high rental demand. A vacancy Rate above 4% indicates low demand and that there is more stock available than required.[3] Rental vacancy rates across our region are very low. (Table 3)

Table 3 Vacant Dwellings March 2023 [1,2,3,4,5,6]

Vacant Dwellings (March 2023)	Aldinga SA2	City of Onkaparinga	Greater Adelaide
Rented properties	1,509	15,402	152,198
Vacant Rentals	24	258	1,309
Air BnB Listed Dwellings	252	564	2,972
Total Vacant Dwellings (Lng+AirBnB)	276	822	4,281
AIrbNB % (AirBnB/Total Vacant Dwellings)	91.3%	68.6%	69.4%

The effect on supply of the short-term rental and holiday market as it has grown over the last decade is often overlooked in housing discussions. Table 3 compares the number of vacant properties and those listed on Air BnB. It is important to remember that Air BnB is only one short-term rental platform.

Advocates of short-term rental properties often misrepresent the number of properties as only a small percentage of the total rental pool. It is more appropriate when addressing the rental crisis to represent them as a percentage of vacant properties.

Table 3 shows that a significant percentage of vacant dwellings that could be a home, are instead reserved for holidays. By encouraging landlords of short-term rentals to switch to long term rentals, homes could become immediately available and help a family in crisis.

Tables 4 and 5 show the difference that would be made to the Rental Vacancy Rate if 25% or 50% of Air BnB properties were offered as long-term rental homes instead.

Table 4 Change to Vacancy Rate if 25% of AirBnB in a region became a long-term rental.

Switch 25 % Airbnb to Long term	Aldinga SA2	City of Onkaparinga	Greater Adelaide
Vacant Rentals	87	399	2052
Air BnB Listed Dwellings	189	423	2229
Vacancy Rate if 25%Airbnb become long term	5.77%	2.59%	1.35%

Table 5 Change to Vacancy Rate if 50% of AirBnB in a region became a long-term rental

Switch 50 % Airbnb to Long term	Aldinga SA2	City of Onkaparinga	Greater Adelaide
Vacant Rentals	150	540	2795
Air BnB Listed Dwellings	126	282	1486
Vacancy Rate if 50%Airbnb become long term	9.94%	3.51%	1.84%

Short-term rental advocates will argue as to the economic benefits brought by the service they provide. The counter argument to this is to consider an equivalent number of families living in these homes contributing not just economically but becoming part of these communities. The economic benefits would also be felt in a reduction in demand for crisis services and other social support services associated with the rental crisis we are currently experiencing.

Ways to achieve this change

The desire of landlords for greater financial returns has been the main driver of the switch from long-term to short-term rentals over the last decade. To reverse the rental housing crisis, it is important to address the financial incentive directly. Here are a number of ways that this could be done.

Council Rates: (both together)

- Increase council rates of short-term rentals to commercial hotel rates. Rates should be set on the use of the building not its shape.
- Discount rates for landlords offering long-term leases.
    - e.g., 1 year - 10% off, 2 years - 15% off, 3 years – 20% off.

State:

- Set limits on number of days a property can used for short-term rentals.
- Consider a land tax to replace stamp duty to increase the ongoing costs on vacant properties.
- Increase safety compliance on short-term rentals to commercial hotel standards. Safety should be based on use not the shape of the building.

Conclusion

Short-term rental properties significantly reduce the amount of vacant rental stock in an area and rental vacancy rates could be shifted significantly by just a small number of short-term rentals becoming homes.

While incorporating more social and affordable housing into future developments will help in the future, families cannot live in their cars for years waiting. Encouraging landlords to switch to long-term leases as a priority will reduce the number of families in difficulty right now.

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1. Inside Air BnB, www.insideairbnb.com , data provided by Liss Ralston, Inside AirBnB, June 26 2023
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3. Brewsters Property Group (vacancy rate definition), Brewsters Property Group , accessed 10/6/23.
4. RealEstate.com.au – Search for vacant rentals 29/07/23
5. Domain.com.au - Search for vacant rentals 29/07/23
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Document created by M. Farrell, SWWAN Coordinator, on behalf of the Sellicks Woodlands and Wetlands Action Network (SWWAN), June 2023 as part of SWWAN's 'Rewild the Fleurieu' campaign.

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Sellicks Woodlands and Wetlands Action Network (SWWAN)

Inadequate Canopy Cover Targets
in the
Greater Adelaide Metropolitan Region
(September 2023)

Sellicks Woodlands and Wetlands Action Network seeks urgent action to correct a grave error in the Greater Adelaide Urban Canopy Cover Targets in the 30-Year Greater Adelaide Plan (2017).

This error poses a significant immediate and future threat to the health of South Australians. It will result in a severe lack of adequate canopy coverage to protect South Australians from the health effects of increased urban heat due to climate change. This will not only cause an increase in heat related illnesses and deaths but come at significant social and economic cost. All the while, the community remains unaware that genuine targets for their future safety aren't being set or met.

Contemporary and current literature recommend canopy cover needs to be above 30% in future urban landscapes[1][2][3]. Sydney[4] and Melbourne[5] both set a specific future canopy cover **target** of 40%, by 2036 and 2040 respectively. Adelaide[6] has stated the desired outcome differently: that urban canopy cover "***be increased by 20%"*** by 2045.

The misinterpretation of this target as 20% of a current amount rather than an overall gain has resulted in most councils setting 2045 tree cover and planting targets 50-90% lower than recommended by the current literature. Councils with the least amount of canopy coverage have set the smallest targets. For example, the City of Onkaparinga has interpreted a 20 percent increase in canopy cover to mean a rise from 12.5 % to 15%. Yet the intent of the target was surely to increase canopy cover to 32.5%.

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[1] Urban Canopy Targets and Development Controls, GALLAGHER STUDIO, 2021
[2] The Urban Heat Island in Australian City Planning A. Elgendawy, P. Davies, Macquarie University, Dept. of Earth and Environmental Sciences, 2019.
[3] Where Should All the Trees Go?, Greener Places Better Places 2017.
[4] Greater Cities Commission
[5] City of Melbourne –Urban Forest Strategy
[6] 30 Year Plan for Adelaide (2017 Update) p150

Because of this miscalculation, not only has a vastly inadequate amount of shade been planted over the last four years across the metropolitan area, but developers have been building 25-50% more housing on sites than recommended by urban planners to protect our communities from urban heat. Additionally, as developers have had to retain or provide significantly less open space, this miscalculation has been a significant contributor to the loss of mature trees in our landscape. Further, the miscalculation has benefited developers to such an extent that it appears to be a strategic misinterpretation of the target rather than a simple mathematical or administrative error.

Due to the significant health threat that this poses, we ask that the Planning Minister take immediate steps to clarify the intent of the targets. In so doing, the government recognises that the mistake rests on a wrongly applied formula. It is not simply a difference of opinion.

We ask that these steps be immediately taken:

- the State Government immediately amend the Greater Adelaide Plan Target 5 to include a specific Urban Canopy Cover Target above 30%,
- all councils immediately reset their canopy cover targets in line with this new target,
- the State Government/Planning SA halts all development approvals until the error is corrected,
- all project approvals not yet under construction be reviewed in line with the new targets by Planning SA once the new targets are legislated,
- an investigation be initiated into how such an error occurred.

The Problem

The problem is that there are two possible interpretations of the phrase “increased by 20%” as set out in Target 5 of the 30-Year Greater Adelaide Plan.

This should be understood in comparison to Sydney and Melbourne: both of their Plans state a specific future canopy cover **target** of 40%:

- ***City of Melbourne Target*** – *“Increasing canopy cover from 22 per cent to 40 per cent by 2040.”* [7]
- **Greater Sydney Target** – *“A target has been set to increase tree canopy cover to 40 per cent, up from the current 23 per cent.”* [8]

[7] City of Melbourne –Urban Forest Strategy
[8] Greater Cities Commission

However, the Greater Adelaide Plan does not specify a specific target figure, but rather sets a **target increase**.

> " *30 Year Plan for Greater Adelaide (2017 Update) Target 5*
>
> *Target 5: Urban green cover is increased by 20% in metropolitan Adelaide by 2045.*
>
> *Therefore, the following is proposed:*
> • *For council areas with less than 30% tree canopy cover currently, cover should be increased by 20% by 2045.*
> • *For council areas with more than 30% tree canopy cover currently, this should be maintained to ensure no net loss by 2045."* [9]

By only defining the target as "a 20% increase in coverage", rather than stating a recommended specific target of 40% as Sydney and Melbourne have, a situation is created where two contradictory mathematical interpretations arise.

One interpretation sets 2045 urban canopy cover targets that are aligned with the intent and context of the 30-Year Greater Adelaide Plan (2017).The other sets vastly inadequate targets that pose a significant threat to the health of South Australians.

Interpretation 1: *An increase in the overall canopy by 20 percentage points.*
SWWAN believe that this was the intent and spirit of the legislation. This is supported by scientific literature on urban heat island effects, current and contemporary urban planning recommendations and the context that Adelaide has one of the lowest canopy coverage percentages in Australia as described earlier.

Table 1. Table of 2045 Urban Canopy Cover targets under Interpretation 1 for an example range of current canopy covers of 5-25%.

Example Current UCC	Increase of 20% overall	2045 target
25%	20%	45%
20%	20%	40%
15%	20%	35%
10%	20%	30%
5%	20%	25%

[9] 30 Year Plan for Adelaide (2017 Update) p150

<u>Interpretation 2:</u> *An increase in canopy cover by 20% of the current amount.*
This interpretation provides a literal interpretation that contradicts the spirit and intent of the legislation. The very low targets resulting from this interpretation are far below the recommendations supported by scientific literature and contemporary urban planning guidelines and are dangerous to community health in the future. It is also illogical to consider that the State Government would propose a guideline that resulted in councils with the ***lowest*** amounts of current canopy cover and the most in need of large increases, planting the ***least*** amount of trees over the next 20 years. This interpretation ignores all context and good sense.

Table 2. Table of 2045 Urban Canopy Cover targets under Interpretation 2 for an example range of current canopy covers of 5-25%.

Example Current UCC	Increase by 20% of current	2045 target
25%	5%	30%
20%	4%	24%
15%	3%	18%
10%	2%	12%
5%	1%	6%

It is obvious that Interpretation 2 is inconsistent with the intent of the legislation to adequately improve Urban Canopy Cover across metropolitan Adelaide and that Interpretation 1 is the only reasonable method for setting the 2045 Canopy Cover targets for Adelaide Councils.

It is this second interpretation, in which the target is calculated as only 20% of the current amount, that has been used to set urban cover targets, allocate planting programs and guide development approvals by the majority of councils in Greater Adelaide for the last 6 years. A partial list is presented in Table 3 (next page).

The targets set by the majority of Greater Adelaide Councils are significantly below the recommended standards, both current and contemporary for 2017. This means that for the last 6 years, most councils have been planting only a tiny amount of the required amount of future canopy cover, while builders have been chopping down trees and filling blocks with eave to eave housing. This has resulted in significant budgetary savings to councils and boosted profits for developers, but at what cost to society?

Council	Current Urban Canopy Cover (Trees >3m)	Target Increase in Urban Canopy Cover	Target (% UCC 2045)
Adelaide Hills Council	n/a	n/a	n/a
City of Adelaide	n/a	n/a	n/a
City of Burnside	31.0%	n/a	n/a
City of Campbelltown	18.4%	n/a	n/a
City of Charles Sturt	14.0%	3% (20% of current)	25% (higher target set than 17.4%)
City of Onkaparinga	12.5%	2.5% (20% of current)	15% (Not stated on Website)
Town of Gawler	15.00%	15% (100% of current)	30% (Double current)
City of Holdfast Bay	15.3%	1.5% (10% of current)	16.8% coverage by 2030
City of Marion	15.00%	19% (More than double)	34%
City of Mitcham	42.00%	0	42% no net loss of canopy
City of NPSP	24.0%	4.8% (20% of current)	29%
City of Playford	15.0%	5% (33% of current)	20%
City of PAE	12.0%	3.5% (30% increase of current)	16% (not given on website)
City of Prospect	20.4%	4.1% (20% of current)	24.50%
City of Salisbury	20.4%	4.1% (20% of current)	24% (not stated on website)
City of Tea Tree Gully	28.00%	na	na
City of Unley	26.0%	5.2% (20% increase of current)	31%
Town of Walkerville	25.0%	5% (20% increase on current)	30% (not stated on website)
City of West Torrens	12.6%	2.5% (20% increase on current)	15%

Table 3. Greater Adelaide Council Urban Canopy Cover Targets and Increase.

Based on the City of Onkaparinga's targets and 2023/4 planting budget of approximately $1million, SWWAN estimates that the cost for all councils to adopt an appropriate tree planting program will cost Onkaparinga an extra $7million annually, and the state an extra $100m-$150m. Over the coming 20 year length of the program, this represents a cost of $1.5bn-$2bn. In our opinion, the health, social and economic costs of not rectifying the problem will be much, much higher.

Urban Canopy Cover

Increasing urban canopy cover is a key method to reduce the health and economic impacts of climate change. Increased canopy cover in urban areas reduces urban heat effects by creating shade.

Over the coming decades the climate will become hotter and drier with an increase in extreme events such as heatwaves. Heatwaves and extreme heat already kill more people each year in Australia than any other natural hazard. Research shows there are significant public benefits associated with greater urban canopy coverage, with improved physical and mental health for residents and a lower economic health burden for the state. A 2022 University of Adelaide study of heat related mortality (HRM) showed that there is great potential to reduce HRM in Adelaide by increasing tree coverage.[10]

Urban heat causes significant economic impacts. Increased sick days, loss of productivity, equipment and infrastructure failure, all come at an economic and social cost as shown in Figure 1, from a study of Western Sydney Councils. Increasing canopy cover in our urban and built environments is essential to adapting to climate change and protecting our communities.

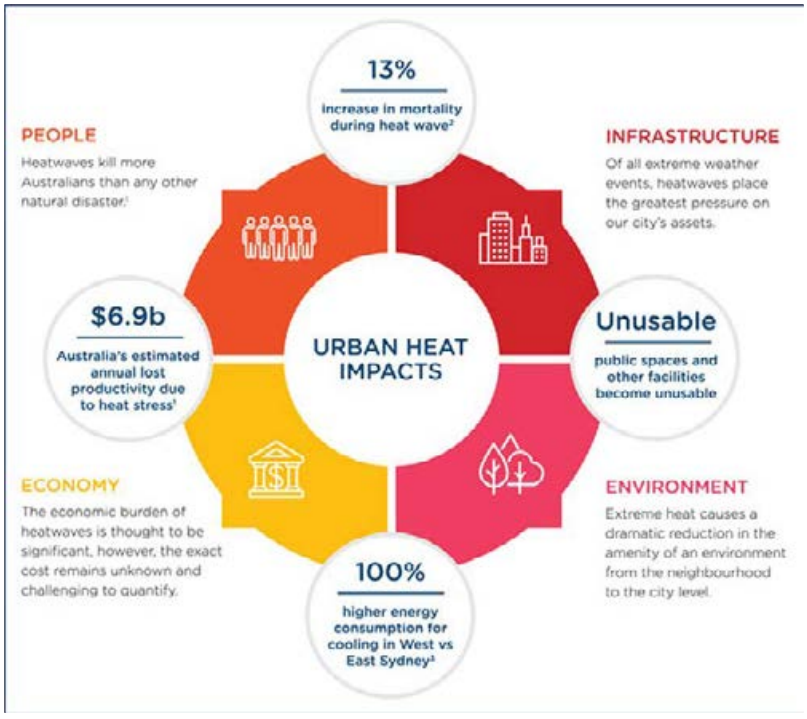

Figure 1.Diagram of key urban heat impacts in Western Sydney[11]

[10] The Potential for Urban Canopy Cover to Reduce Heat-Related Mortality in Adelaide. Carlos et.al. 2022
[11] Western Sydney Region of Councils: Turn Down the Heat. 2018

Canopy Cover- Context and Industry Recomendations

A major resource in the setting of Adelaide's Urban Canopy Cover Targets was "Where Are All The Trees?" (WAATT?), produced by Greener Spaces, Better Places in 2014. Urban Canopy Cover in Greater Adelaide was reported as 27%, much lower than most other Australian capital cities and the national average of 39%.[12] The majority of Adelaide councils fell into the low range of 10-20% (Fig. 2).[13]

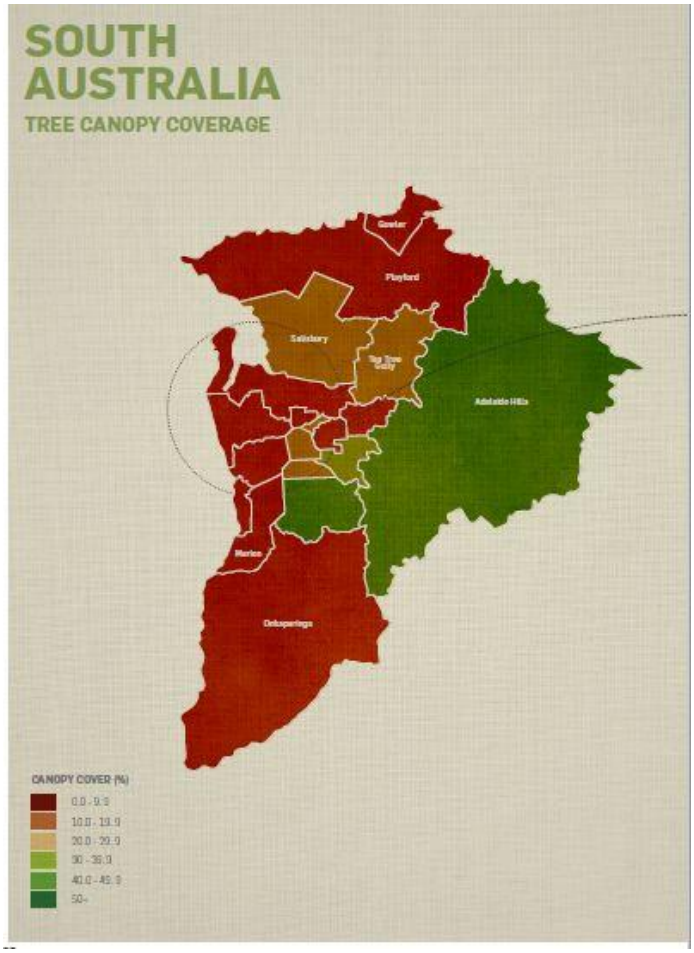

Figure 2. Comparison of UCC Hobart/Adelaide

Figure 2. Adelaide LGA's Canopy Cover

"Hobart is the highest ranking capital city in terms of the proportion of tree canopy to other kinds of ground cover. Hobart boasts 59% tree canopy cover. By comparison, Adelaide has the lowest proportion of tree canopy among Australia's capitals with 27%." WAATT?, 2014.[14]

[12] Where are all the Trees? Greener Spaces Better Space P9
[13] Where are all the Trees? Greener Spaces Better Space P9
[14] Where are All the Trees? Greener Spaces Better Spaces. p18

In 2019 Greener Spaces Better Places released the follow up report, “Where Should all the Trees go?”. The method for calculating canopy cover was changed and Adelaide’s average cover in 2013 was adjusted to 21.37%. Shockingly though, by 2017 this had declined to 19.45%, a loss of nearly 10% on the previous figure (Fig. 3) [15]

Figure 4. SA Snapshot. Where Should All the Trees Go? Greener Places Better Places 2019. p52

“Where should all the trees go?” also introduced a vulnerability index that measures a community’s risk to urban heat that takes into account a range of factors and effects. South Australia is one of the most vulnerable states on the National vulnerability Index(Fig. 4).

Figure 5. National Vulnerability Index. Where Should All the Trees Go? 2019. p7

[15] Where Should All the Trees Go?, Greener Places Better Places 2017.

Scientific literature and the urban planning industry all agree that to protect the health of the population and infrastructure in the future, urban canopy cover needs to be at least 30%[16], and preferably as high as possible, as every increase in cover sees a reduction in ambient temperature. The Urban Canopy Targets and Development Controls report used by the NSW Government to set its target of 40% outlines generic targets in a typical Australian suburb for each different urban zoning(Fig. 5). [17]

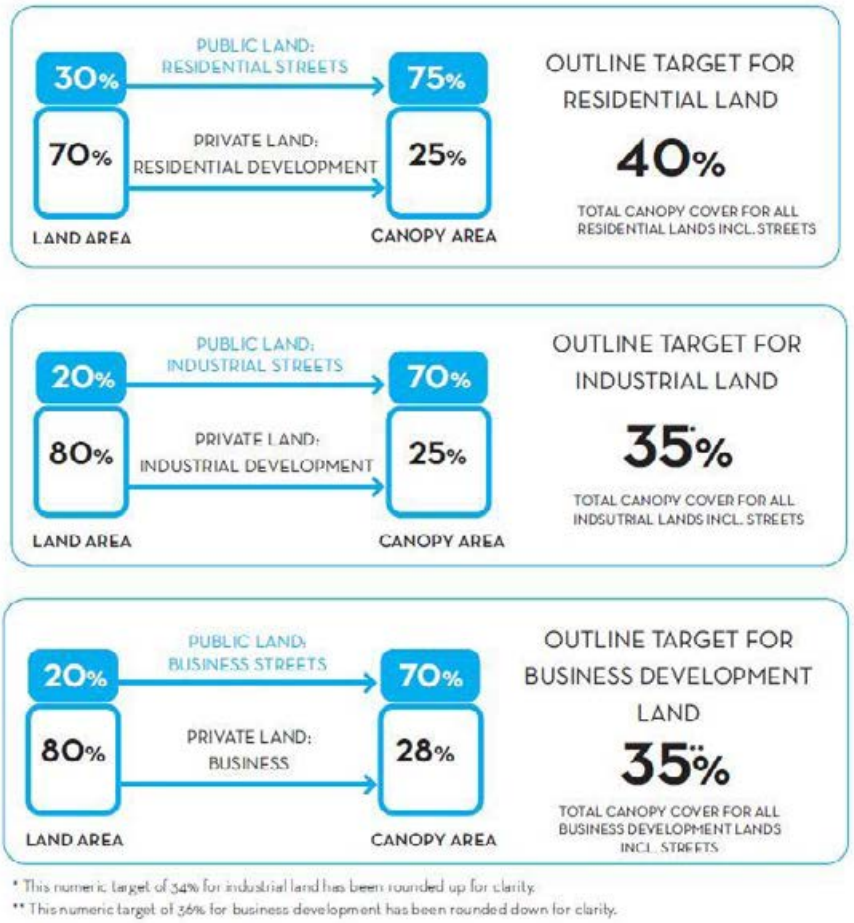

Figure 6. Outline canopy cover targets for residential, industrial and business development. GallagherStudio. 2021.

It can be seen from these examples that Adelaide has the lowest canopy cover relative to the rest of the nation. This, along with other factors, makes us very vulnerable to the effects of increasing urban heat. Contemporary and current literature recommend targets of at least 30% urban canopy cover to protect the health of residents and workers in urban environments in the future. Climate forward states have set targets that surpass 30%. South Australia should act immediately to do so too.

[16] The Urban Heat Island in Australian City Planning
[17] Urban Canopy Targets and Development Controls, GALLAGHER STUDIO, 2021

SWWAN's Suggested Amendment

SWWAN proposes the following suggestion to amend the wording of the Greater Adelaide Plan and remove the ambiguity in the current wording of Target 5.

Suggested new wording for 30 Year Plan Target 5

Target 5:

Urban green cover is to be at least 30% coverage within each metropolitan Adelaide council by 2045. to ensure that the overall average for metropolitan Adelaide is above the current National average of 39% by 2045.

- *Therefore, the following is proposed:*

  • For council areas with less than 30% tree canopy cover currently, total cover should be increased by a total of 20% to above 30% total coverage by 2045.

  • For council areas with more than 30% tree canopy cover currently, total cover should be increased by a total of 15% to above the current National Average of 39% by 2045

  • For councils with greater than 39% canopy cover should increase by 20% of the current amount.

Under our amendment, the City of Onkaparinga would set a target of 32.5%, just above the state average and the 30% threshold but still below the national average. The City of Unley would have set a target of 46% placing it just above the national average. (Table 6)

Table 4. Comparison of canopy coverage target setting methods for 3 Adelaide councils.

	City of Onkaparinga	City of Unley	City of Mitcham
Current Canopy Coverage	12.5%	26%	42%
Current 2045 Target (increase)	15% (2.5%)	31% (5%)	42% (0%)
2045 SWWAN Targets (increase)	32.5% (20%)	46% (20%)	50% (8%)

Conclusion

We understand the scale and cost of what we are asking. The scale is simply what is needed; the cost much less than the health, economic and social costs of following plans that are inadequate to address the urban heat effects of climate change.

DTI:PlanSA Submissions

From: Alice Clark | Shelter SA [redacted]
Sent: Thursday, 2 November 2023 12:02 PM
To: DTI:PlanSA Submissions
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: Shelter SA Greater Adelaide Regional Plan Submission.pdf

You don't often get email from [redacted] Learn why this is important

Please find attached the Shelter SA Submission to the GARP Discussion Paper.

Dr Alice Clark
Executive Director
Shelter SA
The South Australian Peak Body for Housing

[redacted]
PO Box 6207 Halifax Street Adelaide SA 5000
We acknowledge and respect the Kaurna people as the traditional custodians of the ancestral lands we live and work on and their deep feelings of attachment and relationship to country.

Greater Adelaide Regional Plan Submission

Introduction

Shelter SA is the peak body for housing in South Australia. Established in 1977 as an incorporated association, our vision is for all South Australians to have safe, secure, affordable and appropriate places to call home.

Shelter SA members include many of the major charities and not for profits in South Australia that provide human services and social housing with a smaller number of associate corporate members. Shelter SA is an independent, not for profit and registered charity, due to our connection with our members who work directly with citizens towards the benevolent relief of poverty.

Shelter SA constituents are people living on low incomes who are experiencing the greatest housing need and are at risk of, or experiencing homelessness. A low income household is defined as being in the lowest household income quintile of $30,000 per annum or below.

During the last two years, Shelter SA has written multiple submissions to government consultations and inquiries, that have relevance to this submission to the Greater Adelaide Regional Plan and these are referenced at the end of this document.

We also refer the Commission to the recommendations report from the Taskforce on Older Women and Housing Security (the Taskforce), which is relevant to this review, and is awaiting publication by the South Australian Government.

Background

The right to adequate shelter is a basic human right and housing is a social determinant of health. When South Australians do not have a home, they are denied their human rights and the opportunity to develop to their full potential.

A lack of access to housing results in homelessness for many people. Last year there were almost 20,000 South Australians who received homelessness services and many more who were turned away or did not have their short, medium or long term housing needs met. An alarming 40% of clients are children and young people. It is no coincidence that the number of people receiving services matches two other numbers - over the last twenty years, South Australia has sold approximately 20,000 public housing properties to the market and the social housing waiting list is almost 20,000 applicants (not individuals). These numbers give some indication of the size of the issue.

In addition to experiences of homelessness, thousands of South Australians live with housing stress, that is when low income households are paying more than 30% of their income on housing. Charities are overwhelmed with people seeking assistance, who cannot afford to feed their families.

The organisations are forced to undertake fundraising activities as government funding does not adequately reflect community need. This situation is unacceptable and must be rectified.

The Commonwealth Government funds South Australian specialist homelessness services at an amount of $71 million a year, yet the scale of housing outcomes that are needed to relieve homelessness cannot be attained. For the proportion of people experiencing homelessness who have high and complex support needs, private rental is rarely an option as they require significant support and supported accommodation to thrive.

Private rental has been unaffordable for people living on low incomes for many years and now South Australia has one of the lowest vacancy rates in the country, the available, accessible housing outcomes have narrowed significantly. Nor does South Australia have enough crisis accommodation to meet the daily needs of people who have no shelter.

The Terraces, managed by Unity Housing Company, provides an example of a gold standard of supported accommodation. The Terraces is a purpose built rooming house, that provides self contained, secure, supported and affordable accommodation. Each region of Adelaide and rural region should have similar accommodation.

Inclusionary Zoning

An increase in the supply of social housing is critical to achieving the principles and aims of the Greater Regional Adelaide Plan. One aspect of achieving increased supply is to address the use of public land and quarantine it for social housing. To this end, Shelter SA has long advocated for a review of the Inclusionary Zoning Policy to adopt a mandatory scheme that produces social housing instead of affordable housing at a market discount.

When the affordable housing mandate was introduced, it was intended to include 10% affordable housing and 5% for high needs housing, however, to our knowledge high needs housing has never been an outcome and that aspect of the original policy intention has disappeared from the policy. When the policy commenced it was more effective as house prices were relatively low compared with today's prices. The policy is no longer relevant to low income households and should not be marketed as such.

When land is rezoned and immediate increases in value result, especially when there are public land sales, considering social housing as infrastructure creates an imperative to use the value uplift to provide a social good. Like the way we insist on open spaces, there should be an imperative to contribute to social equality and diverse housing that is placed above maximising profit making. There is little point in producing discount to market house sales for the middle classes and the discount should be directed to subsidising social housing. The Discussion Paper refers to the "missing middle" and unfortunately does not have a focus on the households living with the greatest housing need.

If the South Australian inclusionary zoning policy was changed to mandate a proportion of social housing instead of affordable housing, the recent largest land releases in South Australia's history would not represent a missed opportunity to increase the supply of social housing, without a cost to government. Shelter SA supports the introduction of a Mandatory Inclusionary Zoning framework as produced by the Constellation Project[1].

[1] https://theconstellationproject.com.au/wp-content/uploads/2020/07/2020-05-15-MIZ_Brochure_20200318_v6.pdf

Housing as Essential Social Infrastructure

While we continue to place social housing in a welfare context, we will never reduce or end homelessness. Your postcode should not determine your life outcomes or doom you to social inequality. If the planning system seeks true social equality, the provision of low cost rental housing, market rental housing and social housing must be considered as essential social infrastructure – a concept that is omitted in the discussion paper. Transport, employment and health care are important, however without including housing as essential social infrastructure, the importance of having a secure foundation for people to live their lives is overlooked.

Social housing rentals are the only current option that is affordable for low income households. State Government commitments to increase the supply of social housing are welcome however do not meet current or future projected need, without the development of additional and alternative housing products and sources of investment.

Housing Diversity

While we continue to build expensive, large homes on expensive, large land lots and experience delays in the supply of materials and labour shortages, a failure to innovate in housing supply and disrupt the current market will not result in an improved housing future for South Australians.

Shelter SA has researched and consulted at length the production of modular or pre-fabricated homes. There are multiple manufacturers across the State who could have the capacity to mass produce high quality dwellings at scale if there was a pipeline of work. Many are preoccupied with supplying worker camp-style accommodation and school buildings but could be encouraged to focus on residential supply if the right planning structures were in place. When produced with an economy of scale, smaller dwellings (two bedroom) with a smaller footprint and land use, can achieve savings in costs and reduce the time needed to complete builds. With the growth of single person households, two bedroom, smaller homes would be more suitable for singles and were endorsed as a suitable housing option by the Taskforce.

We were pleased to see an expression of interest by the South Australian Housing Authority inviting industry to provide their ideas about supplying modular dwellings as public housing at eleven locations across the State however, the outcomes of that process remain unreleased to applicants and the public, as far as we are aware. If spending commitments for public housing were to harness modular builds, potentially the number of houses built could be increased significantly.

South Australia has the highest cost of utilities in the country. Modular homes are highly energy efficient and therefore would also serve to alleviate cost of living pressures for low income households, with smaller footprints, and adequate heating, cooling and insulation.

Modern Villages

Thousands of South Australians are locked out of the home ownership market. If a new housing product was created that was affordable for low income households, it would ease the housing crisis, reduce the social housing waiting list and the need for social housing while providing the affordability, availability and security that people want and need.

Through harnessing existing legal structures such as retirement villages and residential parks, and producing lend lease communities, it is possible to build modern villages with alternative housing products as described above, if they can progress smoothly through the planning system.

The price point that is affordable for low income households is $200,000 or lower, which would enable the household both to achieve a mortgage and affordable repayments. If homes could be supplied for $100,000 and sold for $200,000, with the land leased long term, there is a financially sustainable model for private and public finance and land holders. The land holder can benefit by retaining the ownership of their land, avoiding the cost of subdivision, capturing capital growth and achieving cash flow with a choice available to own and operate the development, sell it or outsource its management. Assisting Shelter SA in developing this sustainable financial model were workshop participants at an event held with the Town of Gawler.

There are existing residential parks throughout the State with differing levels of amenity. The Shelter SA modern village concept is guided by a set of principles to ensure that villages are places that people aspire to live in, and the homes are attractive and of high quality and amenity. The concept does not describe a social housing option to group together people with high and complex needs but aims to achieve a social mix of incomes and family types to attain a diverse community, with communal spaces that can be enjoyed by residents.

Smaller, modular dwellings situated on the same site are also suitable for crisis and short term accommodation for families who are currently offered motel accommodation which is not suitable for children, nor financially sustainable for government.

Allowing smaller minimum land lots also has the potential to improve affordability. Modern villages are one of the recommendations from the Taskforce.

Aboriginal People

Homelessness, housing stress and overcrowding are experienced disproportionately by Aboriginal people in South Australia. While a commitment to the Uluru Statement from the Heart is mentioned in the Discussion Paper, to achieve social equality for Aboriginal people, social housing, housing diversity and alternative home ownership products have a critical role to play and only provide a greater imperative to adopt innovation and investment in these areas.

Not for Profit Land Holdings

South Australian not for profit and charitable organisations own significant land holdings, some of which are underutilised or contain buildings that are not fit for purpose. Not all these organisations have access to strategic land asset management advice, and Shelter SA has previously developed a proposal to develop a land asset database, to make such advice accessible to them, but does not have the resources to implement the concept.

Build to Rent

The current shortage of rental properties is causing an increase in homelessness in South Australia and people have no option but to live in caravan parks, tents or couch-surf, with families being forced to sleep in their cars. Rental supply must be increased as quickly as possible and Shelter SA is supportive of build to rent projects, especially when they are produced on public land, to prevent land sales to the market, with the proviso that low cost rentals are included, not solely luxury housing. State Government initiatives to encourage build to rent projects are welcome.

Granny Flats

Changes to the rules around renting granny flats to non relatives are welcome however it is not known if local governments are consistently up to speed on the changes and how easily supply can

be achieved. A pathway for granny flats to be added to large public housing and community housing lots could assist in easing the housing crisis and the demand for social housing.

Conclusion

South Australians must accept that if we are to achieve social equality and the housing that people need and can afford, higher density and alternative forms of housing are an essential part of our future in all our suburbs and regions. The planning system has an important role to play in facilitating both aims and we look forward to the outcomes of the review.

Please contact me if you require further information.

Shelter SA Submission References

Modern Village Concept PowerPoint

Modern Village Concept Written Outline

Submission to Inquiry into Housing Availability

Election Platform

Moving On Report

Residential Tenancies Act Review Submission

Worsening Rental Crisis Submission

National Housing and Homelessness Plan Submissions

By National Shelter

By Shelter SA

Contact

Dr Alice Clark
Executive Director
Shelter SA
[redacted]

From: [redacted]
To: DIT:PlanSA Submissions
Cc: [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 1:02:48 PM
Attachments: image001.jpg
image002.png
Submission SCCA - Greater Adelaide Regional Plan (Nov 2023).pdf

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> You don't often get email from [redacted]. Learn why this is important

Dear PlanSA,

Please find **attached** a submission from the Shopping Centre Council of Australia on the Greater Adelaide Regional Plan Discussion Paper.

Could you please confirm receipt of our submission?

Please do not hesitate to contact us should you have any questions or wish to discuss further.

Kind regards
Nick

Nicholas Karam
Senior Policy Advisor

Suite 218, Level 2, 165-167 Phillip Street
Sydney NSW 2000
M [redacted] **E** [redacted]
W www.scca.org.au @SCCA_Advocacy

SHOPPING CENTRE
COUNCIL OF AUSTRALIA

6 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

via email: plansasubmissions@sa.gov.au

Greater Adelaide Regional Plan

The Shopping Centre Council of Australia (SCCA) appreciates the opportunity to make this submission to the State Planning Commission (the Commission) in relation to the Greater Adelaide Regional Plan (GARP) Discussion Paper (Discussion Paper).

The SCCA represents major shopping centre owners and operators in South Australia and across Australia. The SCCA provides this high-level submission noting that consultation on the Discussion Paper is high-level at this stage.

KEY POINTS TO GUIDE THE DEVELOPMENT OF THE GARP

- The SCCA advocates for the continued elevation of shopping centres in meeting the long-term planning goals and objectives of the South Australian Government and the Commission, including greater density in and around shopping centres.
- The retail sector is critically important in providing jobs and essential services for future growth. We welcome the fact that the Discussion Paper recognises this. The GARP should encourage investment, remove barriers to growth and support greater density.
- Activity centres must continue to play an important role in planning and future development, with the primacy of the retail core retained in activity centres.
- The GARP should provide flexibility for land uses around shopping centres with greater density in activity centres, including mixed accommodation, commercial, and education uses. Additional density around shopping centres can be done in a measured and balanced way so as not to limit the feasibility and prime purpose of shopping centres.
- The GARP must encourage the delivery of enhanced public transport, public infrastructure, and civic works around each centre, and support adequate parking provision rates that allow shopping centre owners and operators to manage their car parks effectively.

KEY REASONS

The SCCA is and remains a strong proponent of centres-based planning. The concentration of activity in centres, including retail uses and development, supports many 'public good' outcomes sought by planning systems.

These include choice for consumers, transport/infrastructure efficiency and productivity, environmental and heritage protection, sustainability, resource protection, employment concentration, and the minimisation of land-use conflict. All of these have been identified in the Discussion Paper as critical in the development and finalisation of the GARP.

The SCCA is keen to ensure that South Australia's planning system continues to reinforce a positive, centres-based approach to investment and to highlight the importance of activity centres, and the importance of a well-defined and supported centres hierarchy, as being critical to guide development, including investment in retail floorspace, across South Australia.

As has previously been recognised by the Commission:

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> "*shopping centres and main streets are the heart of vibrant and connected communities and support South Australia's growth and development. For many years, planning policy has supported a centres hierarchy approach, from regional and district level shopping and services through to neighbourhood and local centres providing for smaller scale conveniences*".

This must be a key aspect of the GARP as it is developed and finalised and must be a key consideration for the Commission as it develops plans for future growth and development, as outlined in the Discussion Paper.

South Australia's emphasis on activity centres, higher density mixed-use precincts and developments along transit corridors, as articulated primarily through *The 30-Year Plan for Greater Adelaide*, is considered a key strength of the South Australian planning framework, and has provided a fairly stable climate for investment. The GARP (which is set to replace *The 30-Year Plan for Greater Adelaide*) must continue to emphasise and recognise the importance of activity centres, higher density mixed-use precincts and developments along transit routes.

THE ROLE OF SHOPPING CENTRES

We welcome the fact that the Discussion Paper recognises the importance of the shopping centre sector and retail trade to the South Australian economy.

The figure on page 23 of the Discussion Paper highlights that retail trade is the second largest industry in the Greater Adelaide Capital City region. Further, figure 13 on page 149 demonstrates that retail trade will continue to grow as an industry of employment and will remain in the top 4 industries of employment across the Greater Adelaide employment lands.

Shopping centres have played a critical role and should play an elevated role in meeting the long-term planning goals and objectives of the South Australian Government, and in addressing the goals, themes, and principles set out by the Commission in the Discussion Paper:

- ***The 12 major trends***: as outlined on pages 34-35 of the Discussion Paper, the Commission has identified 12 major trends and drivers that will shape the future of Greater Adelaide. The shopping centre sector has and will continue to play a vital role in meeting/addressing those trends and drivers of change, especially:
  - Housing availability and affordability: by facilitating mixed use developments.
  - Liveability: by developing shopping centres that deliver products, services, and experiences that consumers want and need close to where they live and close to transport hubs.
  - Digitisation: by changing and growing to satisfy consumer preferences and reflect developments in technology that improve the retail experience.
  - Workforce, skills, and migration: by investing in shopping centres and tenants, and creating job opportunities.

- ***The four outcomes***: as outlined on page 36 of the Discussion Paper, the Commission has developed four outcomes for Greater Adelaide. The shopping centre sector will be critical to achieving every single one of these outcomes:
  - A greener, wilder and climate resilient environment: our members are voluntarily obtaining National Australian Built Environment Rating Scheme (NABERS) ratings and improving their sustainability performance overtime. Our sector continues to heavily invest in and encourages tenants to utilise sustainable and climate friendly practices.
  - A more equitable and socially cohesive place: shopping centres are spaces for communities to meet, gather, and partake in experiences that are beneficial for community cohesion. Our members continue to invest and develop strategies to enhance customer connection and create more positive experiences so that people feel they can visit more often and for longer.

- A strong economy built on a smarter, cleaner, regenerative future: retail is not static and spending trends, populations, and catchment demographics change over time. This means that shopping centres need to be dynamic to make sure that consumer trends are satisfied and that shopping centres do not stagnate and decline. As outlined earlier and recognised in the Discussion Paper, the retail sector is critical to economic productivity and job creation and will continue to grow as an industry of employment.
- A greater choice of housing in the right places: as the Discussion Paper recognises throughout, new housing should be developed close to amenities and jobs. Shopping centres are essential to the delivery of both amenities and jobs (and more).

- ***Living Locally***: the four outcomes set out above will be part of the 'Living Locally' concept that the Commission is exploring as set out on pages 84-91 on the Discussion Paper. We welcome the fact that shopping centres are recognised as a critical part of 'Living Locally.' If 'Living Locally' is explored further and ultimately pursued, the Commission must recognise the importance of activity centres in fulfilling the 'Living Locally' vision and should retain the primacy of the retail/shopping centre core in these activity centres. Future developments in proposed areas of investigation, growth corridors, and employment growth areas should pursue a centres-based planning approach.

- ***Quotes****:* as a final point, the Discussion Paper makes a number of salient points that we wish to stress and reinforce:
  - On page 59: *"Every person, no matter where they live, should have access to transport, employment, healthcare, shops and services and high-quality green space."*
  - On Page 87: *"Research across Australia shows people prefer neighbourhoods with good access to high quality local transport and within easy reach of family, work, shops and amenities."*

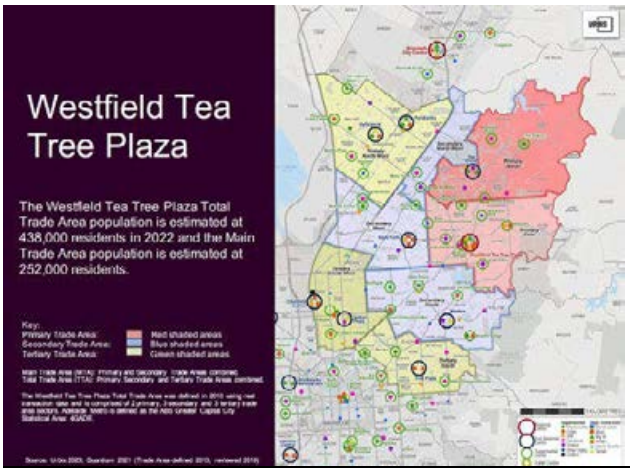
As it is developed, the GARP should similarly recognise the importance of our sector in meeting the long-term planning goals and objectives of the South Australian Government and the Commission.

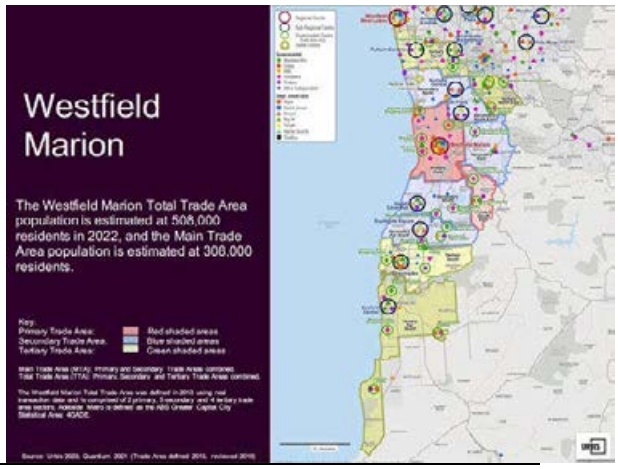
ACTIVITY CENTRES

Activity centres are focussed around large retail centres that service a broad population and include public transport interchanges or high frequency public transport connections. By way of example, Westfield Marion and Westfield Tea Tree Plaza.

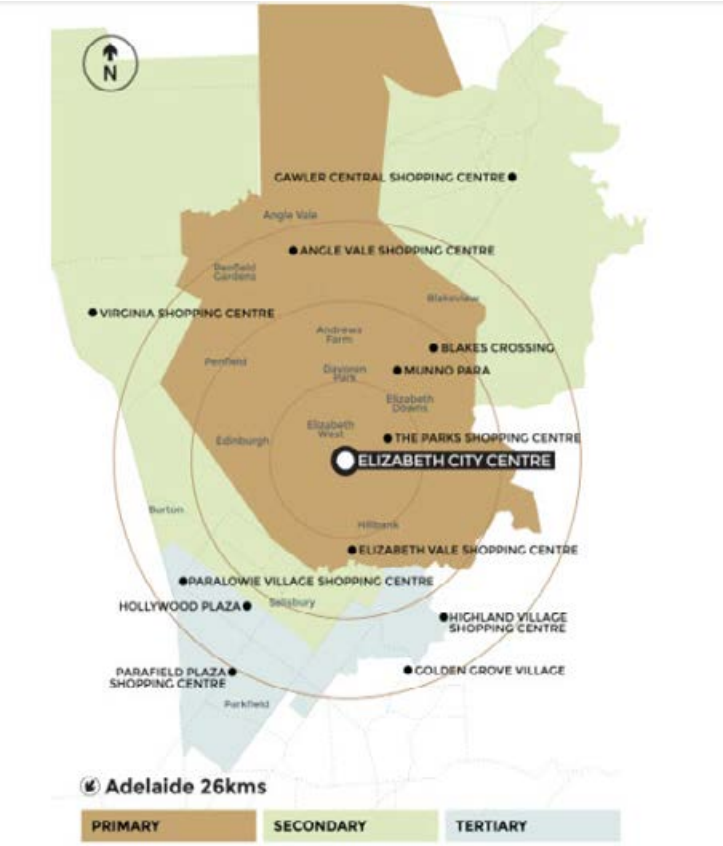
Due to their scale and population catchment, these shopping centres generally provide a full range of services like shopping, entertainment, health, community, and recreation. This provides an opportunity to further develop higher-density housing that will capitalise on the proximity to these services and support their economic viability.

This is highlighted in the trade maps for Westfield Marion and Westfield Tea Tree Plaza. Together, these two centres service close to an estimated 1 million residents.





Vicinity Centres, another member of the SCCA also has a strong presence in South Australia. One of their largest centres in South Australia, Elizabeth City Centre is a regional shopping centre located around 26km north-east of the Adelaide CBD that services close to 250,000 people in its total trade area.



Activity centres have a range of agreed benefits. They become hubs of the community, maximise Government's own investment in infrastructure and concentrate employment. Investment in activity centres is also self-fulfilling. Concentrating employment, both pre-and post-construction, in an activity centre has flow on benefits to the surrounding and new business (e.g. employees purchasing meals, doing their grocery shopping etc.).

The SCCA supports the approach of most governments to concentrate retail and commercial uses in designated activity centres, and the avoidance of ad hoc development and investment.

The GARP must not weaken centres-based land use policy as this would undermine the opportunity for the retail industry to respond to challenges from online retailing and the shared benefits of agglomeration. Centres based policy helps to increase the range of goods and services afforded within a centre and accordingly the attractiveness of centres to provide a single point of shopping and services, reducing the need to travel and add to the carbon footprint.

As outlined in the *Revitalising Retail – Policies in the Planning and Design Code:*

> *"activity centres have been one the pillars of South Australia's growth and development"* and have *"contributed to the…equitable and convenient access to shopping, administrative, cultural, entertainment and other facilities that enable a number of activities in a single trip."*

All of this links back to the outcomes and concepts identified in the Discussion Paper as being critical to the success of and shaping of the Greater Adelaide Region as it grows and develops. Activity centres must continue to play an important role in planning and future development, with the primacy of the retail core retained in activity centres.

BROADER RELATED POINTS

The GARP should continue to highlight the importance of a well-defined and supported centres-based hierarchy in facilitating future planning and development.

A well-defined centres-based hierarchy will not only help to meet the themes and goals set out by the Commission in the Discussion Paper but will continue to encourage retail investment and development across South Australia.

We have noted and highlighted the importance of activity centres above but note that a well-defined centres-based hierarchy encourages good development in neighbourhood and local centres.

The GARP should not promote an increase in out of centre retailing.

Doing so would result in poor development outcomes that undermine the retail hierarchy and disperse trips and activity outside of activity centres where transport and supporting services and goods are provided.

The assets of our members play a critical role in supporting job creation, economic productivity, and delivering essential services and amenities close to homes in neighbourhood and local centres. For instance, Fairview Green Shopping Centre in Fairview Park which is a neighbourhood shopping centre owned by Region Group. This neighbourhood shopping centre services a population of over 270,000 within a 10km radius.

The GARP should equally recognise the role of shopping centres in neighbourhood and local centres/communities.

The GARP should facilitate and encourage retail investment and remove barriers to development in the Commission's stated preferred locations of future development. This would assist the delivery of Government's other priorities, such as infrastructure efficiency, housing delivery, and facilitating vibrant mixed-use communities.

We support the need to ensure that policy is current, meeting emerging issues, and setting a clear pathway to encourage retail investment in the right locations across South Australia.

The Commission and the GARP must continue to identify clear pathways to encourage retail investment in the right locations and to see the continued growth of vibrant and accessible mixed-use precincts across South Australia.

Reduction in red tape and the length of time it takes for planning approvals will also help deliver the Commission's objectives set out in the Discussion Paper. A reduction of red tape could:

- Provide flexibility for land uses around shopping centres with greater density in activity centres, including mixed accommodation, commercial, and education uses.
- Promote above ground apartments in activity centres, where residents benefit from convenient access to shops, services, and transport.
- Enable shopping centres to expand by allowing development opposite/adjoining existing centres and allowing development in convenient new locations.
- Remove barriers to innovation and efficiency.

The GARP should provide guidance that it is a collective responsibility to achieve balanced transport outcomes across activity centres, and that the burden should not fall unfairly on any particular landowners. It is not the responsibility of centre owners to fund regional road or public transport improvements. Some consideration of collective benefit and shared responsibility should be a central theme.

As a final point, the GARP should support and recognise the need for adequate parking provision rates or other mechanisms to support the effective management of parking at shopping centres.

Over time, government policies have often meant that the provision of car spaces as a proportion of floor space has declined, making it more difficult to manage shopping centre car parks in a productive and effective manner.

The core purpose of shopping centre car parks is to provide parking for customers, and ensure they are managed productively for them (e.g. each space is turned over a number of times each day). Customers are the life-blood of shopping centres, especially for small businesses, as they predominantly spend money within centres with the tenants who pay rent to be located in the centre.

As such, the GARP should allow for adequate car parking provision rates or other mechanisms at shopping centres to allow shopping centre owners and operators to manage their car parks effectively.

NEXT STEPS

We thank the Department in advance for its consideration of our sectors perspective. We would welcome an opportunity to discuss these comments further, if required, and will look to opportunities to engage further and provide detailed feedback on the Commission's draft GARP.

CONTACTS

James Newton, Manager – Policy and Regulatory Affairs, SCCA, [redacted],

Nicholas Karam, Senior Policy Advisor, SCCA, [redacted]

DTI:PlanSA Submissions

From: Penny Worland [redacted]
Sent: Monday, 6 November 2023 12:53 PM
To: DTI:PlanSA Submissions
Subject: Submission - GARP Discussion Paper
Attachments: GARP Discussion Paper Submission. Social Planners Network of SA. Nov 2023.pdf

> You don't often get email from [redacted] Learn why this is important

Please find attached a submission on the Greater Adelaide Plan Discussion Paper.

5 November 2023

Attention: Growth Management Team
Planning and Land Use Services
Department for Trade and Investment

Via: plansasubmissions@sa.gov.au

Submission to the State Planning Commission regarding the Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to make a written submission regarding the Greater Adelaide Regional Plan Discussion Paper.

This submission is from the Social Planners Network of South Australia (SPN).

The SPN is a group of over 100 professionals from a wide range of fields with an interest in high quality social outcomes for communities across the state. In the main, SPN members are urban planners, social planners, and community services staff working in local government. The network also includes representatives from state government agencies and private consultancies with expertise in these disciplines.

The views expressed in this submission are those of the SPN members who contributed to it, reflecting their specialist expertise, and are not necessarily reflective of the views of the organisations our members are employed by.

Representatives of the SPN will be available to discuss any aspects of this submission should you wish to do so.

Introduction

South Australia requires a strategic and consistent approach for addressing the growing social needs of our state.

Not unlike our international counterparts, South Australian communities are facing some of the greatest challenges of our time including climate change, economic disruption, the local effects of global pandemics, housing crisis, ageing populations, and soaring numbers of people who report feeling disconnected and lonely.

Whilst it is not the only lever, land use planning has an important role to play in addressing these and other social needs of communities in Greater Adelaide (and beyond).

There are various ways that land use planning and urban development impact both positively and negatively on people and their lifestyles, so the Greater Adelaide Regional Plan (GARP) represents an important opportunity.

Our comments in this submission are informed by many years of experience working at the interface of social policy, urban and regional planning, urban design and local governance, and are aimed to enhance the positive social outcomes enabled by the GARP.

In making our submission we recognise the integral link between the GARP and the various mechanisms within the planning system guiding its effective delivery and achievement of its aims, critically including the Planning and Design Code and the State Planning Policies.

What do you think of the four outcomes guiding how Greater Adelaide should grow?

Are there any other outcomes the Commission should consider?

Understanding equity and the persistence of place-based disadvantage

We support the focus on achieving *a more equitable place* as a key outcome for Greater Adelaide.

There is a growing body of evidence highlighting that social and economic disadvantage is not evenly distributed, rather it is concentrated in particular places. When the outer fringes of our cities are used to meet the growing needs of populations, for example housing, but without adequately catering for the employment, transport, and human service needs of these populations, there is a risk of perpetuating place-based disadvantage. There is evidence that where we live can have major influence on the opportunities afforded to us in life. Conversely, when investment into our existing communities is overlooked (such as inner urban areas), these communities are done a disservice, as their needs do not remain static over time. It is important that innovative ways are found to meet their needs at the local level – not always resorting to regional-based models.

The Discussion Paper describes some parameters of equity that are relevant to land use planning. It is important that the GARP also includes indicators and measures describing the dimensions of equity that are being addressed, to enable evidence of whether or not the desired outcome of a more equitable city is being achieved over time, and in what ways.

Social cohesion can mean many things and may contribute to exclusion

While we support the focus on achieving *a more socially cohesive place* in the Discussion Paper, what constitutes *social cohesion* is not well-defined or described. The GARP will need to better articulate what this means and what contribution land use planning will make to it.

There are potential tensions between different understandings of social cohesion. For example, it could be argued that an existing neighbourhood with uniform types of housing (low-density single dwellings) and residents of similar backgrounds and socio-economic characteristics should not have affordable housing, or housing choice introduced – on the grounds that the neighbourhood is 'socially cohesive'. That is, not-in-my-backyard (NIMBY) attitudes to diverse housing forms can potentially be justified by reference to 'social cohesion'. There is a risk that a narrative of 'social cohesion' contributes to, or justifies, social exclusion.

The built environment and land use planning can promote social inclusion

We believe the GARP could identify other social outcomes such as *social inclusion* alongside, or instead of, social cohesion. For example, a *more inclusive* Greater Adelaide would have:

- housing variety and choice
- active and public transport options
- universal design of public spaces and the public realm
- more social diversity within neighbourhoods.

This would mean that older people, children and young people, people with disabilities, migrants, and others could have their needs addressed in Greater Adelaide.

There is a need to at least maintain, if not increase, the socio-economic mix in Greater Adelaide in order to maintain the vibrancy and diversity of what makes the city an exciting and culturally enriching place to live, work and visit.

We encourage a closer examination of the social outcomes that the GARP is proposed to achieve, especially regarding social cohesion and other possible outcomes like social inclusion.

Aboriginal cultural lens on planning, design and development

The Discussion Paper recognises the importance of reconciliation, including voice, treaty, truth as part of creating *a more equitable and socially cohesive place*. This will need to be followed through into real mechanisms for better considering First Nations perspectives on how greater Adelaide grows, and how and where the associated urban development occurs.

There is no formal referral in the planning system for Aboriginal heritage matters. This creates a disconnect between the state government's roles of approving development and protecting Aboriginal heritage. A commitment should be made in the GARP to better balancing Aboriginal heritage protection and providing for the housing, employment, recreation, and service needs of our growing population.

State Planning Policy 7.2 is: *Recognise and protect Indigenous cultural heritage sites and areas of significance.* It states that 'the Planning and Design Code should implement this by identifying areas and places of national, state and local heritage value and may include the identification of places, including the extent of their cultural heritage significance.' If the Planning and Design Code does not proactively identify the extent of a place's cultural heritage significance, then looking into the cultural heritage significance of a place before development occurs should become a feature of the development application and approval process.

This is supported by mention in the Discussion Paper of the state government's commitment to implementing a First Nations Voice to the Parliament of South Australia, and the following statements:

- *We can also look at ways to incorporate Aboriginal voices and cultural knowledge in the planning system through deeper engagement.*
- *Recognise and protect Aboriginal cultural heritage through better engagement with Aboriginal peoples and identification of sites and areas of significance.*

Agreed processes for achieving these aims will need to be established and maintained to ensure a better connection between the often-conflicting responsibilities of meeting the needs of an increasing population and protecting Aboriginal heritage.

What other major trends and drivers might shape the future of Greater Adelaide?

How should a land use plan address these trends and drivers?

Strategic planning for an ageing population and people with disability

An important trend for the GARP to consider is the ageing population. We are living longer, but not healthier. South Australia has the highest proportion of older people on mainland Australia, with more than 630,500 people aged over 50, which is 37 per cent of the total population. The majority of over-65s (95 %) live independently at home, with only one in four people aged 85 and over living in aged care accommodation. (Ref: South Australia's Plan for Ageing Well 2020–2025).

We suggest there could be integration of evidence-based ageing friendly principles into the GARP, with consideration given to Adelaide formally becoming an Age Friendly City.

The principles of living locally are aligned to age-friendly communities but they need to go further. There is a need to consider land uses that enable ageing in place, given most older people live independently. Land use planning is needed for accessible and diverse housing options, as well as retirement villages and aged care facilities, so that people don't need to leave their neighbourhoods, families, and social supports in order to access increased supports as they age.

This approach aligns with demographic trends in South Australia, the United Nations Sustainable Development Goals, World Health Organisation, etc.

Useful resources: National programmes for age-friendly cities and communities (who.int)

Similarly, there is a growing need to create environments that are accessible for people with disability. Long term policies of deinstitutionalisation have meant that more people with disability are living in the community. However, we have legacy environments that are not accessible, including housing, commercial and civic buildings, and the public realm.

The GARP will need to be consistent with the Principles of Good Planning which include universal design practices. The goals of Universal Design should be expressed in the GARP to ensure the built environments of the future are accessible to the widest possible range of people. This goes beyond meeting the minimum requirements of the *Disability Discrimination Act, 1992*.

How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?

How can infill development achieve an urban form that is consistent with the principles of Living Locally?

A critical gap for both greenfield and infill development is integrated planning, coordinated delivery, and sufficient funding for social infrastructure

A key need which the GARP could address is for a more coherent and consistent approach to planning and delivery of social infrastructure. This would support the aspiration for a more equitable city, as well as help to deliver the vision for living locally.

South Australia needs more effective and systemic mechanisms for this category of infrastructure delivery. There hasn't been a shared resource to inform social infrastructure planning in this state since the 1990s (Human Services Planning Kit). Despite being around 30 years old, this tool is still used by some consultants in SA, along with interstate social infrastructure planning tools that were designed for very different contexts.

We believe there is a need to develop contemporary planning methods, definitions, resources, processes, and funding mechanisms for social infrastructure which are tailored for the South Australian planning system and address community needs in both infill and greenfield communities. The GARP will provide the impetus for addressing this gap, as it will set the strategic direction for the neighbourhoods that house the majority of the state's residential population.

About social infrastructure

Although social infrastructure is globally recognised as an important infrastructure category, it has no universal definition.

Infrastructure Australia defines it as 'the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities' and has recognised our 'growing and aging population, increasing urbanisation, advancements in technology, and changing work patterns will impact the social infrastructure sector over the next 15 years and beyond' (Ref: A spotlight on social infrastructure - Infrastructure Magazine).

The planning and provision of infrastructure for what is often referred to as 'human services', such as essential health and education facilities, is often the focus when addressing the large-scale social infrastructure needs of our ever-expanding communities, however, planning for localised social infrastructure is important too. These are tangible facilities like community centres, libraries, art/cultural precincts, and intangible or 'soft' infrastructure like social networks, knowing your neighbour, or home supports that help with cleaning and cooking. They can be private spaces, like cafes or cinemas, or they can be public, like cultural centres or parks, and increasingly they can be a mix of both. Land use planning has a role in enabling this infrastructure to be delivered in-step with community need.

Often localised social infrastructure is not valued until there is an immediate need such as concentrated job losses, social conflict or in most recent events a global COVID-19 pandemic. This is despite Infrastructure Australia recognising 'the important cultural and economic contributions that social infrastructure make'. With the recent global pandemic, it is an opportune time to revisit the value of localised social infrastructure and seek out ways to embed innovative examples within our communities for the benefit of current and future generations. Land use planning has a role here.

Despite recognition of the fundamental importance of social infrastructure, it continues to appear low on the priority list for strategic and major funding. State funding supporting the GARP outcomes should be available to better enable the sophisticated delivery of this essential localised infrastructure.

Other jurisdictions in Australia have implemented mechanisms for better social infrastructure planning and delivery, including regional and precinct infrastructure plans, developer contribution schemes, contribution plans, agreed thresholds, partnerships, and co-location models. South Australia could also consider how value capture from upzoning and public realm upgrades can be reinvested in social infrastructure to meet the needs of current and future residents.

Localised social infrastructure is essential to living locally

Localised social infrastructure planning and provision, within cities and local neighbourhoods is often ad hoc and, at worst, an afterthought. It is usually not afforded the same strategic planning and value as other infrastructure types, such as sport and recreation facilities, and open space.

The Discussion Paper identifies that 'major infrastructure' will be planned by the state, however the concept of living locally will not be realised unless social infrastructure is available within neighbourhoods. This creates a tension for the GARP to address. Clearly it will not be possible to include all local social infrastructure in the GARP, considering it caters for an area that will be home to more than 2 million people, but only addressing higher order major infrastructure in the GARP will leave a vacuum that is unlikely to be addressed by the 27 local governments across Greater Adelaide, nor the urban development industry, or service providers.

Whilst there is logic for large-scale delivery of health and social services, such as specialised hospitals based in Adelaide, increasingly people should be able to rely on their local surroundings to meet their everyday essential needs first and foremost (social connection, education, childcare, dental, medical, affordable fresh food), as well as land uses for leisure and entertainment. There is a growing evidence base that suggests adequate and proactive investment in these types of assets for communities not only assists them to cope in times of need, but it also helps facilitate their longer term wellbeing and ability to thrive.

Education facilities are an example that need greater attention. Education is an up-stream determinant of health, and schools are an important site for building networks and social inclusion in local communities. Schools also require good land use planning and design to ensure they:

- are well located and accessible in the student catchment they serve
- support co-location with open space, and sport/recreation and other community facilities
- promote active transport by students
- are delivered in a timely way to meet community need and aspiration
- do not require expensive land purchases at residential prices.

Coordinated outcomes such as these require careful planning – there is an urgent need for better leadership and policy direction for planning education infrastructure in South Australia.

Not assessing the capacity of social infrastructure in existing neighbourhoods that are subject to infill development will have a negative impact on the social licence for infill. When people can't get their children into a local childcare centre, school or sporting club, they will resist further urban densification. It is therefore

essential that modelling is done for social infrastructure capacity and the additional demand that comes from new housing development.

Public and active transport should be a bigger focus

The GARP should include a stronger vision for a transport system for Greater Adelaide that enables a shift from private vehicles to other modes of travel.

There is a growing movement in South Australia calling for cycling infrastructure that is safe for younger people, older people, and everyone in between. This is not only for leisure, but importantly also for daily travel needs. Living locally will require viable alternative transport options.

Without significant investment in cycling infrastructure within our state, along major transport corridors, planned into the fabric of proposed satellite cities, and considered as part of every major transport strategy and upgrade, the conditions required to provide safe cycling infrastructure will never be realised.

It is imperative the government take on this agenda in a strategic and coordinated way. A long term and committed investment in cycling infrastructure is also an investment in tackling climate change, investing in the health and wellbeing of all citizens, as well as tackling increasing cost of living pressures. This investment and strategic planning would be a tangible and innovative way to meet the needs of future generations. Significant state involvement is required in this, as the local government role alone is not at the scale required to have the necessary impact.

Better approaches to neighbourhood and sub-regional scale planning for transport are required so that alternatives to private vehicle use become attractive and viable for short distances, and so that mass transit is available for longer distances. This may also require setting more ambitious housing density targets to support viable transport systems and a greater density of destinations (e.g. services, facilities) within reach of local neighbourhoods.

The greenfield investigation areas identified in the Discussion Paper are mainly aligned to road corridors. This sets up a dependence on road infrastructure in meeting the associated transport needs and there is no substantial discussion of mass transit services to these areas. For example, Murray Bridge is just one hour from the Adelaide CBD by car. There is a risk that a large new residential development located there would generate substantial traffic on the South Eastern Freeway if there are insufficient local jobs created and the SE Freeway will already be under increased pressure from future growth in and around Mount Barker.

Strategic planning for housing affordability and diversity is needed

Affordable and social housing should not be left to greenfield development on the urban fringe. This creates a car-dependent lifestyle with significant impact on household finances, especially felt by those on lower incomes. This creates a problem for achieving a more equitable place.

It is also important to not inadvertently plan families out of cities. With a lot of two parent households in which both parents are working, it is important that people can live close to where they work, and their children can attend school along the way. The GARP should allow for the fact that not all families want to live on large blocks. Considering increasing cost of living pressures, these families need to be working, and any spare time is usually spent recreating or caring for the family members – many don't have the time or resources to maintain larger spaces. Quality public open space plays a critical role in meeting these needs in urban areas, allowing families to not have to move neighbourhoods based on the changing needs of their families.

The trend to smaller households also needs to be better addressed with regard to new housing stock. Unfortunately, it seems that most new dwellings continue to be built with three or four bedrooms and there are not enough smaller dwellings available for small households, to reduce housing costs and for those wanting to downsize within familiar neighbourhoods.

In general, we support the redevelopment of existing suburbs along with strategic and other infill, in preference to the continued expansion of the urban fringe. There is capacity for Greater Adelaide to become a much denser city, which would support liveability, including better availability of services and facilities in local neighbourhoods. Low density greenfield development is both expensive to service (for new infrastructure) and expensive for households to operate due to transport related costs. Without a radically new approach to planning and delivering services and mass transit to these outer suburban communities, there will be continuing inequity for their residents.

What are the most important factors for the Commission to consider in meeting future demand for open space?

What are the most important factors for the Commission to consider in reviewing and achieving the Urban Green Cover Target? (20% increase by 2045)

Stronger mechanisms are needed for boosting tree cover and urban greening

Trees and green spaces are essential for human health. Current efforts to maintain and expand tree cover and urban greening appear to be inadequate. This issue requires investment driven at the state level, to complement efforts by local government.

The impact of urban infill on greening and the loss of existing trees is a significant concern, necessitating stronger policy and requirements at the project level as well as mechanisms to set targets, plan, and allocate resources for urban greening at sub-regional and neighbourhood scale.

Conclusion

The GARP is an important opportunity to set the direction for how Greater Adelaide grows, and what it is like to live here, into the future. Central to this is the field of urban planning's role in planning for people. In order to set strategic direction that addresses concerns relating to our legacy urban form, costs of living, and pressure on the environment, more ambitious, bold, even radical action may be required. The GARP should be brave in leading change of the scale required to achieve its aims.

The Discussion Paper encompasses some important social factors and outcomes of urban planning and development, including equity and social cohesion (inclusion). It also sets out the physical parameters for accommodating population growth, via targeted infill and regeneration, and greenfield development.

This submission supports many of the aims and desired outcomes expressed in the Discussion Paper and provides encouragement for them to be taken further towards bold systemic change that influences markets and provides for better social, environmental and cultural outcomes of urban development.

To realise the concept of living locally in a way that works for people, real mechanisms, including those that influence market factors, will need to be in place to achieve sufficient local provision of employment, education, active transport, health and social service, retail, entertainment and opportunities to connect. Without mechanisms to impel the market to respond there is a risk of establishing new residential areas in satellite city locations without the increased social infrastructure needed to make living locally more possible. It is critically important that the GARP balances these aspects so there is not a mismatch between a focus on satellite growth areas and the aspirations of living locally, and that transport needs are properly considered to achieve positive lifestyles.

Delivering the GARP will rely on the alignment of the various mechanisms within the planning system to respond to the changes required, and the resources to make it all happen. A great challenge to achieving via the GARP the outcomes identified in the Discussion Paper, and any more expansive notions, is ensuring that

each urban development action taken via application of the State Planning Policies and the Planning and Design Code contributes to the future picture painted by the GARP vision.

On behalf of the Social Planners Network of South Australia, thank you for the opportunity to contribute to the development of the Greater Adelaide Regional Plan.

Any questions about the content of this submission can be directed to Penny Worland on Email: [redacted] or PH [redacted]

Yours Sincerely

Penny Worland

Convenor

On behalf of the Social Planners Network of South Australia

DTI:PlanSA Submissions

From: Alicia Clutterham [redacted]
Sent: Monday, 6 November 2023 3:18 PM
To: DTI:PlanSA Submissions
Subject: South Australian Cricket Association - Greater Adelaide Regional Plan Discussion Paper - Submission November 2023
Attachments: SACA GARP Submission 6 November 2023.pdf

You don't often get email from [redacted] Learn why this is important

To whom it may concern

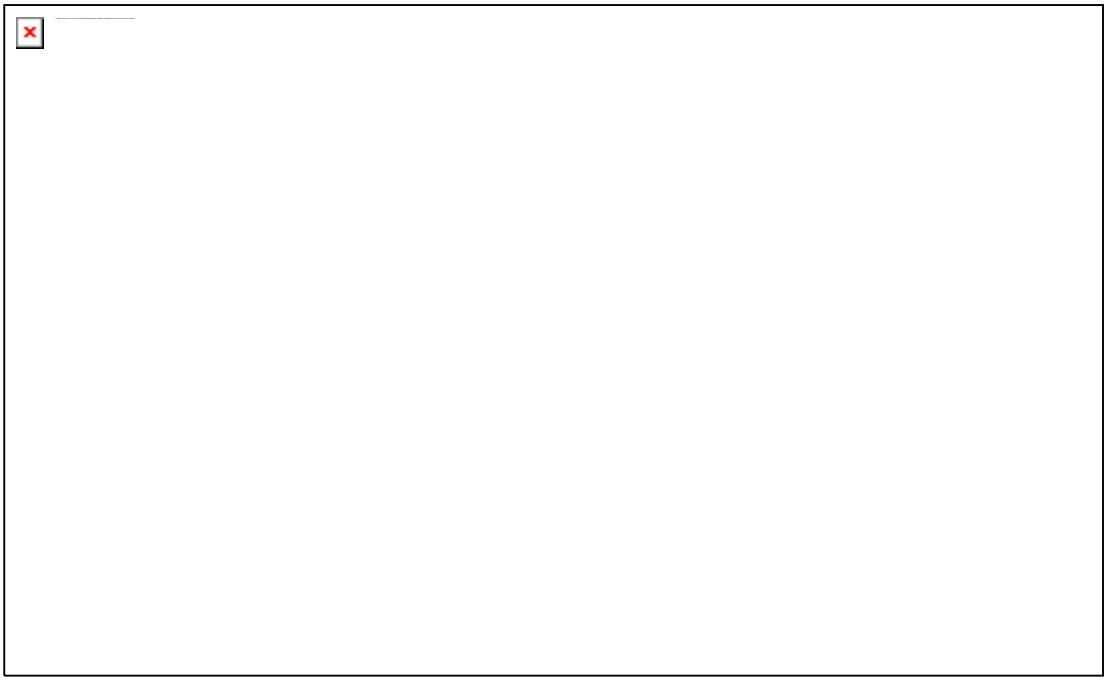
Please find attached a submission from the South Australian Cricket Association on the greater Adelaide Regional Plan Discussion Paper.

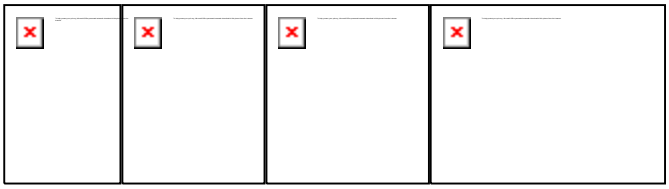
We thank the Department for the opportunity to make this submission and welcome further engagement as the GARP progresses.

Should you have any enquiries, please do not hesitate to contact me on [redacted] or [redacted]

Warm regards
Alicia

Alicia Clutterham | Manager - Facilities & Infrastructure | SACA
South Australian Cricket Association | Adelaide Oval | North Adelaide 5006 | South Australia
[redacted]
www.saca.com.au | www.adelaidestrikers.com.au





At SACA we are proud to live, work and play cricket on Kaurna land. We acknowledge the Kaurna people as the Traditional Custodians of this country and we pay our respects to Kaurna Elders past, present and emerging. We also extend that respect to all traditional owners of country throughout South Australia. Please click here to learn more about SACA's commitment to Reconciliation.

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Mr Craig Holden
Chair
State Planning Commission
c/o Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

6 November 2023

Dear Mr Holden,

Greater Adelaide Regional Plan Discussion Paper

As the peak body for cricket in South Australia, the South Australian Cricket Association (SACA) is responsible for managing, promoting and developing the game of cricket in South Australia.

SACA welcomes the opportunity to make a submission as part of the consultation for the 'Greater Adelaide Regional Plan Discussion Paper' (GARPDP) in recognition that sport and recreational infrastructure is critical to the health, wellbeing and quality of life for South Australians.

SACA is committed to working with all levels of government in developing quality facilities that provide enhanced liveability and a welcoming environment for all players, officials, volunteers and fans across South Australia.

In 2022/23, over 45,600 people played organised cricket in South Australia, some from as young as five years old.

Population Growth Challenges

It is very important that sporting oval and facility provision is considered in the context of population growth within both infill areas and Greater Adelaide greenfield sites.

The population growth experienced in recent years in the southern suburbs has presented multiple challenges with regard to provision for number of and appropriate cricket facilities (both on and off field). Specific examples include Brighton Cricket Club, Reynella Cricket Club and Southern Districts Cricket Club not having the number of and suitable venues to play cricket each week. Both the Reynella Cricket Club and Southern Districts Cricket Club have had teams travelling into the Adelaide Park Lands to play home games with up to 45-60mins travel needed each way.

This experience has highlighted the importance of the need to plan for and provide for population growth areas outlined in the GARPDP with significant potential growth noted for the Outer North.

A concerted and coordinated approach between developers (if relevant), Councils, State Government and State Sporting Organisations early in the land use planning process is critical.

A number of Councils across metropolitan Adelaide are already experiencing a lack of places to play cricket with the issue expected to intensify with higher density development and urban infill.

Education Site Access

There is a strong need, particularly at infill locations for school sites to be accessible (through formalised hire agreements) to cricket clubs for after school hours access to cater for these growing populations. One of the key priorities in the South Australian Cricket Infrastructure Strategy is to provide new playing fields and access to school sites (outside of school hours).

SACA has recently introduced a new funding program called Places to Play. This program provides a $20,000 grant to a school for a new cricket pitch in schools with the grant contingent on the school and local cricket club entering into an MOU to provide the oval for junior cricket on the weekend and outside of hours needed by the school. To date, SACA has issued 19 primary and secondary schools with new cricket pitches in 2022 and 2023, with another 20 to be issued in 2024.

The development of state government principles, policy and incentives to support sporting utilisation of school sites would assist the implementation and utilisation of school sites for out of school hours sporting activities.

In acknowledging that creating new ovals and playing fields within existing inner city metropolitan locations will not be possible, alternative solutions such as oval lighting (at community and school sites) is also a priority. This could extend the capacity of existing sporting facilities into evening hours where areas are experiencing growing populations through urban infill and high density development.

Planning System

SACA recommends that greater consideration is needed for appropriate land to be set aside for sporting oval / playing fields and associated infrastructure within the planning system.

The existing 12.5% open space allocation, whilst valuable for the provision of open space such as playgrounds, pocket parks and drainage reserves, is rarely considered for the provision of much needed sporting and community hubs. There are numerous examples of appropriately planned and designed community and sporting hubs located within residential developments interstate which could be replicated within South Australian growth corridors. Examples of this have occurred in Victoria at the Casey City Council, Hume City Council and the City of Melton through the Victorian Governments Growing Suburbs Fund (GSF).

In addition to the current need for a formalised mechanism for the provision of sporting facilities (as occurs with open space under the *Planning, Development and Infrastructure Act 2016*), a fund is required for sporting facility provision to assist with the delivery of this infrastructure.

The provision of land for sport and recreation facilities requires inter-agency consideration with the Department for Infrastructure and Transport; Department for Education; and Office for Recreation, Sport and Racing working with Local Government and State Sporting Associations to address current and future needs. As the peak body for cricket in South Australia, SACA is willing to provide pro-bono advice to these agencies on the facility provision required for cricket in South Australia.

In relation to playing fields for cricket, there are a number of metropolitan areas that are experiencing pressures due to the scarcity of available playing fields with off field amenities such as toilets and changerooms. These areas include the north eastern, southern metropolitan and all areas immediately surrounding the Adelaide CBD.

With the forecast population growth outlined in the GARPDP, it is imperative that there is a mechanism within the South Australian planning system to facilitate the adequate provision of sporting spaces and infrastructure, in addition to open space which primarily addresses parks, playgrounds, streetscapes and stormwater detention/drainage.

Thank you again for the opportunity to provide feedback on the Greater Adelaide Regional Plan Discussion Paper. SACA would welcome a meeting with the Department for Infrastructure and Transport to further discuss the opportunities raised in this letter.

Please contact me at [redacted] or [redacted] if you would like further information.

Yours sincerely,

[redacted]

Alicia Clutterham
Manager Facilities and Infrastructure
South Australian Cricket Association

DTI:PlanSA Submissions

From: Maddie McShane <[redacted]>
Sent: Monday, 6 November 2023 4:56 PM
To: DTI:PlanSA Submissions
Subject: Submission- Greater Adelaide Regional Plan Discussion Paper
Attachments: SAGE Submission.docx

You don't often get email from [redacted] Learn why this is important

Hi,

Please find attached the following submission to the Greater Adelaide Regional Plan Discussion Paper on behalf of the South Australian Grassroots Ecosystem 'SAGE'.

We appreciate the opportunity to be involved in the consultation and look forward to further engagement.

Warmly,
Maddie.

Organiser, SAGE.

South Australian Grassroots Ecosystem
The Joinery
111 Franklin Street 5000
Email: sagrassrootsecosystem@gmail.com

Attention: Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001
Submitted via email to: plansasubmissions@sa.gov.au

Monday 6 November 2023

Re: Submissions on the Greater Adelaide Regional Plan Discussion Paper

To whom it may concern,

The South Australian Grassroots Ecosystem ('SAGE') appreciates the opportunity to provide this submission to consultation on the development of the Greater Adelaide Regional Plan ('GARP') Discussion Paper. SAGE is a community body working at the intersection of sustainability and wellbeing. SAGE has over 550 members and holds monthly community events that regularly draws attendances of over 100 members to build connections, empower community action and educate on sustainability and related practices. We are actively involved with several bodies of work regarding issues of social inequity, nature protection and restoration, climate action and community engagement. Hence, we hold a particular interest in contributing community perspectives towards the development of the GARP.

As a self-described "grassroots ecosystem" we operate as a community of communities. Our events attract a mix of young people, active citizens and industry professionals with a primary interest in nature, the environment and community resilience, as well as regenerative ways of living and working.

The SAGE community comes from a range of professional backgrounds including; ecology, veterinary, design, professional services, non-profit leadership, local government, public policy, media, art, music, gardening, self-sufficiency and various nature related and non-nature related professions and work.

The GARP was discussed at three different SAGE events; at our monthly gatherings in September and October, and then as part of the Youth Forum in collaboration with the department in November. The majority of the following comments have been transcribed or

synthesized from a consultative workshop at a SAGE event on the 29th of October, further supplemented from other discussions.

Engagement with the GARP included 100 people in face-to-face workshops and over 800 people through our online promotion of the two SAGE events and the Youth Forum.

We note that these views are only representative of a portion of SAGE members, and are not intended to be representative of the community in its entirety. We also acknowledge that these views may be, at least in some regard, incomplete or fragmentary in their nature, as they are derived from multiple different voices which may not always be consistent in every regard.

Finally, we wish to emphasise that if there is any confusion in the interpretation of the following comments, the department is welcome to reach out via email to seek clarity.

We hope that the following discussion and comments will be helpful in guiding the development of the regional plan for a more sustainable and equitable future.

Outcome 1: A greener, wilder and climate resilient environment.

The SAGE community unanimously identified that the goal of Adelaide becoming *cooler, greener and wilder* should be treated as a priority. We commend the GARP Discussion paper on identifying climate impacts, biodiversity loss, food and water security and changing mobility systems among the key trends and drivers in this area, and wish to emphasise the integral role which these trends should play in underpinning our policies. Acknowledging the severity of our environmental crisis is essential, recognizing that we are amidst the 6th mass extinction.

To have a cooler, greener and wilder city, we must have a more *biodiverse* city, one which truly supports functional ecosystems beyond the construction of simpler environments. It is imperative to transform our approach to biodiversity, emphasising functional ecosystems and recognising the role that they can play in climate mitigation and adaptation. This may require challenging existing assumptions, such as the notion of “low maintenance landscapes.” We should consider substantial investment in active and community-based landscape management, as the benefits in terms of biodiversity, employment, and ecosystem services far outweigh the costs.

In effort to advance on these issues and so many more, it's crucial that our measures of success are primarily based on ecological knowledge. To achieve this, fostering a more extensive dialogue, engagement and practice between governance bodies and ecologists is essential. Scientific evidence should be the primary driver of environmental policy, which requires establishing suitable structures for planners to receive informed guidance from ecologists. The best available evidence is accessible, if you are willing to integrate it into political decision making, and as numerous international reports suggest (e.g. IPCC Sixth Assessment Report, Climate Change) unless action is taken significant impacts on biodiversity, health, and ergo our economy will be apparent.

SAGE generally supports the priorities and directions identified in the GARP discussion paper, but emphasises that the wording could be strengthened to ensure that serious and adequate investment is directed towards achieving the desired objectives at the necessary scale. For example, regarding many objectives, it is noted that the planning system may be able to "identify areas" for protection and "consider risk mitigation and adaptation strategies." This is, of course, absolutely integral, but must be coupled with support to enable the genuinely development and implementation of the risk mitigation and adaptation strategies. Recognising the inherent limitations of the planning commission, SAGE endorses collaboration between government departments to ensure planning is effective.

Outcome 2: A more equitable and socially cohesive place.

Our members support the prioritisation around an equitable and socially cohesive place, however we'd like to see explicit language that showed accountability towards

SAGE advocates for equitable communities that are walkable, resilient, and accessible to all, catering to diverse needs and populations. Emphasising robust public and active transport infrastructure is crucial for ensuring people can access necessary services. Our vision promotes community planning centred on people, nature, culture, and services, prioritising these over car-centric approaches.

SAGE endorses PlanSA's *SPP1: Integrated Planning*, recognizing that concentrating growth around major physical and social infrastructure can yield positive community outcomes. We stress the critical need to provide cost-effective and accessible infrastructure and services for all. Additionally, we recommend conducting further research and planning to develop mechanisms ensuring the affordability of these essential services. We also endorse SPP 2: Design Quality and SPP 3: Adaptive Reuse, emphasising their mutual complementarity, as adaptive reuse initiatives can naturally promote high design quality standards. We advocate for ecologically informed design policies which make use of underutilised resources to enhance outcomes for nature and people.

However, the current plan does not do enough to deliver the kind of ambitious step change required to direct Adelaide to a future that is akin to a walkable, community-oriented european style city rather than a car dependent, socially inequitable american style city.

Outcome 3: A strong economy built on a smarter, cleaner, regenerative future

SAGE wishes to draw attention to the potential economic benefits of engaging the workforce in work regarding environmental restoration and management. Growing the industry of environmental restoration and management is essential for supporting the agricultural and tourism sectors, as well as being integral for supporting our natural heritage. We advocate for planning which facilitates the growth of the environmental sector, and note that this is complementary with the department's identified principle of regenerative planning.

SAGE identified that we need to understand more about the identification of employment lands before we are able to offer comment in this area, and encourage that further consultation be undertaken in this area.

Outcome 4: A greater choice of housing in the right places

SAGE supports the observations made by the Mt Barker and District Residents Association Inc., which questions the housing and development-centric approach centred on the vague assumption of mandatory population growth. SAGE believes it is crucial to critically consider this premise and thoroughly evaluate, firstly, whether population growth is inevitable, and secondly, to what extent such growth genuinely necessitates new development and to what extent it can be facilitated within our existing infrastructural capacity.

To expand on this point, we note that we are in a rental crisis, not a housing crisis. The proportion of vacant dwellings in Greater Adelaide is not unsubstantial, but people are unable to access these dwellings because of financial barriers and the inherent inequity of the housing market. The occurrence of systems like Airbnb have worsened this inequity; with short term housing reserves increasing barriers to access.SAGE recognises that the solutions to many of these problems may require legislative advances to enhance the rights of renters, and this may be beyond the scope of what GARP can achieve, however, we encourage the department to support such advances wherever possible. Further, we call for the incorporation of more social and affordable housing into future developments.

There is also an extreme waste of housing resources with Australia building the world's largest dwellings, despite an ever-increasing number of single person households. Continued peri-urban sprawl is only serving to continue this unsustainable growth.

In light of anticipated development, SAGE advocates for housing development strategies that *prioritise urban infill over greenfield development.* This approach encourages the efficient use of existing urban spaces and infrastructure, minimising environmental impact and preserving greenfield areas from unnecessary development. Urban infill not only promotes sustainable growth but also enhances the overall resilience and livability of established communities.

We hope that this discussion, in combination with the followings recommendations and workshop feedback, will help in the development of policy for a sustainable future. We are appreciative of being involved in the consultation process, and look forward to responding to the department's "What we heard" release.

Kind Regards,

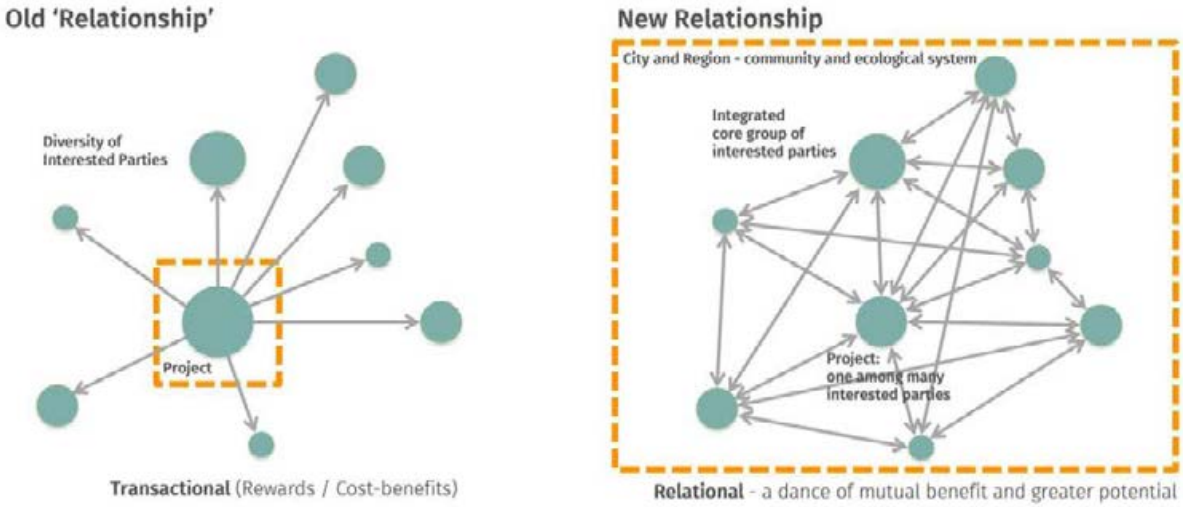
South Australian Grassroots Ecosystem ('SAGE').

Key Recommendations

5 key recommendations have been summarised below according to the themes which arose most frequently across the different discussions during SAGE community consultations and workshops.

1. Engaged planning and active citizenship is vital to establish a thriving, biodiverse city.

Contemporary planning makes attempts to actively engagement citizens and those affected by developments whether that be physical, social or ecological infrastructure. While we acknowledge the barriers to authentic engagement beyond consultation, it is necessary to empower citizens to contribute to our broader society. We recommend the government to have the courage to take a critical review, and ongoing critical reflexivity to consider the ethical and moral impacts of the decisions made on behalf of our population. In addition, we recommend decentralised investment in and engagement with systems organisers and connectors that enable government to have ongoing collaboration through-out projects, rather than purely within consultation periods which allows for ongoing feedback. This would enable a shift from extractive relationships to relationships based on mutual-benefit.



2. Prioritizing active transport infrastructure is imperative.

Our members support active transport and living locally, however we'd like to see more attention given to the fact that transport makes up 23% of Australia's contributions to global C02 emissions, and of this contribution, 45% is made up of passenger cars[1]. This is a statistic that we have the power to change through good urban planning in cities like Adelaide.

[1] Source: ARUP, See Appendix 1.

In the face of a worsening climate crisis and rapid urbanization, urban design experts emphatically advocate the importance of supporting the transition away from a car-dependent society*, to a society where active transport is an accessible option for all*. Vital components of this shift, like well-developed bike lanes, are absolutely essential. Extensive case studies unequivocally demonstrate their transformative impact on people's health, the environment, businesses, and communities[2]. Ignoring this imperative transition jeopardizes our well-being and the sustainability of our cities.

A great deal of discussion was intensely critical of government investment priorities. It is deeply unacceptable that of the $9.9 billion spent on roads and public transport over the last four years, less than 1% of this on active transport infrastructure.[3] We note that the GARP should be poised to facilitate government investment in active transport. A recent response by DIT to enquiries from InDaily has shown that the massive road investment serves only to increase traffic and congestion,[4] yet the GARP still continues to insist on investing significant resources into road infrastructure.

We call on the meaningful development and enactment of plans like the Cycling Strategy 2022-2032,[5] which, despite being drafted with the intention to improve community outcomes around cycling, have failed to be put into action.

It is important to acknowledge that while Adelaide has historically been a car-centric city impart due to it's heritage as place of manufacturing for Holden cars, this legacy can be acknowledged in other ways that do not detract from the sustainability and health goals that active transport enable in our society. [6]Furthermore, it should be acknowledged that world-renowned countries such as the Netherlands where 1 in 4 journeys are made by bicycle, were as car dependent as Adelaide in the 1970s. This shows that the transition to an active-transport centric Adelaide is not out of the question if the necessary political and social will is created for active-travel to become part of our socio-cultural fabric.

3. Investing in efficient, prolific, and accessible public transport is crucial.

SAGE appreciates that the GARP Discussion Paper has brought and acknowledgement of the growth of our changing mobility systems, but advocates that planning policy goes further in enshrining an actionable plan for *efficient, prolific and accessible public transport* across Greater Adelaide.

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[2] See, for example: Pucher, John, and Ralph Buehler. "Walking and cycling for healthy cities." *Built environment* 36.4 (2010): 391-414.

[3]https://www.statebudget.sa.gov.au/__data/assets/pdf_file/0020/914213/23-24-State-Budget-Overview.pdf?fbclid=IwAR0Th1g43hGNH1SB-rFAXYBttpMuCb8FWJKUcCD40hzi_vJmRd8Ahlo1pJ8

[4] https://indaily.com.au/news/2023/11/02/slowdown-adelaides-traffic-grind-revealed-in-new-official-data/

[5]https://www.dit.sa.gov.au/__data/assets/pdf_file/0016/1004272/Cycling_Strategy_Refresh_Draft_11022022.pdf?fbclid=IwAR1MJlQsmX0HIyigW4QgsKOj6ca6joNwpOn3qmSPdftYJFVyvYeFLHr132c

[6] https://www.centreforpublicimpact.org/case-study/focusing-bicycles-transport-urban-netherlands

Transitioning to a greater dependence on public transport systems is essential for enhancing the sustainability of a city, but it also has many potentially positive impacts on communities and local economies. Greater investment in public transportation expands service and improves mobility. If sustained over time, it has many potential economic impacts, including providing travel cost savings and reduced traffic congestion leading to greater business productivity and operating cost savings.[7] SAGE again wishes to draw attention to the historically poor levels of investment in public transport systems, and call that this be reconsidered as a priority in the upcoming policy.

4. Emphasizing medium density, mixed-use development is necessary.

SAGE supports medium to high-density infill in the CBD and surrounding suburbs as a highly effective strategy for climate, social, and economic sustainability. Research shows that cities investing in mixed-use and high-density living can increase property values and tax income. [8]

This financial boost enables the state to invest in proven climate measures like planting trees, increasing canopy cover, and enhancing cycling infrastructure. SAGE points to countries like the Netherlands, where mixed-use and high-density communities foster social interactions, creating a friendly and cohesive environment for all residents.[9]

5. Avoiding additional greenfield development is essential.

Our members oppose greenfield housing and further we oppose the extension of urban sprawl and the loss of our valuable farmland and environmental surrounds. We would like to see an investment within the plan towards undertaking extensive environmental restoration on the necessary scale to reverse biodiversity loss are paramount. Countries such as New Zealand reflect the social and economic benefits of restoring and extending nature spaces around our cities and Adelaide as a recognised nature tourism destination should be reflecting this investment in nature preservation and restoration in our city surrounds.

Beyond Greater Adelaide's urban area, urgent broadscale habitat restoration is crucial, particularly in the Mt Lofty Ranges, to mitigate the impacts of an extinction debt. We recognise that allowing housing to further encroach on greenfield spaces poses substantial risks to our environmental and agricultural values. As highlighted by the Sellicks Woodlands and Wetlands Action Group in their submission *"Within the Mt Lofty Ranges 150,000 hectares of new restoration are required, or over a century of work at current rates. This can be scaled up to achieve the target in the time frame required of the next 50 years, but we must start now by protecting farmland from greenfield development and prioritising broadscale restoration*

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[7] http://reconnectingamerica.org/assets/Uploads/economicimpactofpublictransportationinvestment.pdf
[8] Tong, C. O., and S. C. Wong. "The advantages of a high density, mixed land use, linear urban development." *Transportation* 24 (1997): 295-307.
[9] https://www.tandfonline.com/doi/abs/10.1080/23748834.2022.2067439

programs commensurate with the scales required."[10] We wish to direct the department's attention to the scale of investment drastically required in this area, and the need to halt further greenfield developments.

[10]file://uofa/users$/users3/a1766153/Downloads/Inadequate-Urban-Canopy-Cover-Targets-SWWAN-2023.pdf

Co-Design Workshop for Direct Participant Feedback

SAGE engaged Dr Aaron Davis, a Lecturer in Architecture and an expert in co-design at the University of South Australia to run a collaborative design process with SAGE community members.

42 people were in attendance, with attendees working in small groups of three to discuss and then share what they wanted to see included in the plan. Participants were provided with snapshots of academic research on issues to do with sustainable urbanism, and asked to respond by considering how decisions would change in a scenario where “everyone knew” these facts rather than being swayed by lobbyists.

Part A: Responses to what we know about healthy sustainable cities

This listing is the collated output from attendees at Dr Davis session. Each dot point is the contribution of an individual. Individuals were invited to write more than one item, while a few attendees wrote two items, generally the feedback below matched one item of feedback from people in attendance.

- To make a walkable city and walkable communities we need clear steps ASAP!
- The more driving = greater risk of obesity (we could have walkability scores + chronic disease scores on every house for sale!
- State Government and local Councils could be spending money on greenspaces, bike lanes and walkable community infrastructure supporting healthy urban infill instead of unsustainable sprawl.
- Every plan should start with what is wanted and what outcomes we want to see in the long term.
- Safe road design policies often incorporate things which make roads look more designed for humans, eg. perhaps look more ‘dangerous,’ forcing drivers to be more vigilant.
- Good + healthy communities need
    - Less waste

    - More equity
    - Wildlife corridors
    - Preservation of native plants
- We can reduce the size of roads to create some green corridors, concluding soft mobilities (walking, biking etc) as well as public transport (esp. trams) with their own defined spaces
- Our roads are far too large. Reducing the size of our roads will create so much more space for livelihoods, employment, recreation, culture and nature.
- Smaller roads make people drive more safely. Effectively, roads which look as if they are designed for humans and not cars, create better results for wellbeing.
- Physically separated bike lanes are needed for safety; paint is not protection.
- ‘High maintenance’ green spaces have incredible outcomes for biodiversity, climate, employment, the economy, amenity and wellbeing.
- The power of greening the pedestrian networks we already have - that would:
    - Encourage walking/exercise to local destinations
    - Improve The biophilic experience built in to our active transport network
- Property developers have a profit incentive to build the slums of the future
- Walking/riding a bike to work or your place of study will improve your focus and productivity. At scale this creates more wealth and prosperity amongst our local communities and local economies.
- We can plan for medium density housing and not allow endless sprawl
- People choose cars due to lack of accessibility and unreliability of buses etc.
- We can have safer, more enjoyable walking pathways which will encourage more walking!
- Our cities are already often built on our est agricultural land and urban sprawl is currently one of the biggest threats to prime producing areas like the Hills and Virginia

- More colour in cities = more life and variety in activity and life forms, less depressing suburban lifestyle
- Isolation in a house is not a home - we need open community engagement
- We can be solar positive
- We can build vertically, not horizontally + reuse/repurpose buildings for others in need
- We should celebrate culture as an urban planning priority eg. funky community spaces
    - Cafes, gardens, laneways, events
    - unplanned , wildness and character, pathways to explore -> better mental health
- Every $1 spent on climate adaptation saves $6 in future costs
- We need to ditch the assumption that population growth equates to economic growth. There are finite resources.
- We cannot rely on the existing planning framework to deliver adequate outcomes, particularly in regard to meeting environmental targets.
- Government pay for the cost of less sustainable public housing.
- With the right policy and infrastructure, urban infill can actually lead to more green space.
- We do not necessarily need 300,000 new homes. This assumption is based on trends of constant developments. It may be possible to facilitate many aspects of the growing population within our current housing arrangements - by focussing on enabling more flexible housing arrangements, share housing, subdividing to create smaller dwellings, etc. We do not always need to grow! We may just need to improve what we have.

Part B: Responses to the prompt “Over the next 3 decades we should….”

Participants were invited to stand in the future and consider Greater Adelaide, three decades from now. Participants discussed this concept in small groups of three and then wrote down what they wanted to see included in the plan from this perspective of looking 30 years ahead.

Making Adelaide Cooler, Greener and Wilder.

Green Spaces and Biodiversity

- Ecological and botanical knowledge should inform landscape design. Biodiverse green spaces need to contain more than just a few nationally native plants; rather, they should contain a strategically constructed mix of endemic plants which are best poised to withstand local pressures and support environmental outcomes in the area. It is important that urban green spaces provide safe havens for local biodiversity and native animals threatened by habitat loss.
- We should have more public open space which contains biodiversity and native plantings (less lawn!).
- Better management of stormwater runoff. Well designed gutters and permeable surfaces, such as rain gardens, which properly catch and direct water, mitigate flood risk and decrease pollution in waterways.
- Increase the proportion of permeable surfaces.
- Native local plants focus in city and suburban green-spaces.
- Natural spaces should be designed to cool spaces down and reduce CO2.
- More mangrove and saltmarsh reserves to increase the abundance of highly productive, carbon sequestering ecosystems. These systems are critical for drawing down carbon from our atmosphere and must be protected and increased in the face of climate change and increasing emissions.
- More accessible cool areas in heat waves and accessible water sources. Examples of this include libraries and parks with wading pools/creeks and lots of trees (such as Tusmore Park & Wading Pool in Burnside) for families without air conditioning to retreat to during heatwaves. This is especially important in lower

socio-economic areas that often have less cool green spaces and less access to air conditioning.

- We need to prioritise addressing the biodiversity crises and 6th mass extinction in the planning because too many elements of the plan do not address it at all.
- Have compulsory education on biodiversity and climate change in high schools.
- Business engagement with climate issues.
- Inadequate Canopy cover. 5 years ago in 2018 councils made a huge mathematical mistake setting their targets at 70-90% below industry recommendations. CofOnk 15% by 2045, PAE 16% by 2045, Holdfast Bay 16.8% Other councils are nearly as bad. We are asking for immediate action on this.

- As young people who will be inheriting this planet and city, we also seek more long term visions that will ensure our children and grandchildren will also be safe. We appreciate a 30 year plan but seek to continue the development of our proposed changes by:
    - Promoting awareness that population growth does not equate to economic growth. Our resources are finite and wealth inequality only grows when economic growth is the goal.
    - We can repurpose/reclaim urban parks for local resilience food gardens
    - Service enquiry + prioritise lower socio-economic areas
    - Improve job security + access to mental health days
    - Prioritise biodiversity: councils must focus on planting trees and vegetation that are native and locally endemic because it isn't just about climate adaptation. It's also about reversing extinction by planting and retaining native species that support native wildlife. We need to ensure we have biodiversity and wildlife corridors as well as green spaces. No dolomite on verges.
    - Well implemented coastal management plans.
    - Concentration on restoration and rehabilitation of degraded ecosystems.

- Infrastructure and services

Public transport

- Investment into public transport, in particular trains, is needed to expand public transport networks into the hills and southern areas like Aldinga. This has been proposed but never achieved due to changes in government. Trains are key to a zero-emissions transport future as they can be run electrically, and also more easily accommodate things like wheelchairs, bikes and other accessibility factors. Trains also prevent further congestion, as well as using up less space than roads. High speed rail systems would increase buy-in from the public. Suggested routes include train lines connecting Happy Valley to the City and Eastern Suburbs (Norton Summit/Magill to City), and lateral connections between train lines (ie. Belair to Brighton, Henley to Magill)
- Make public transport free to increase accessibility and useability.
- In Mawson Lakes: close the road between the lake and businesses to make more room for foot traffic and tables for cafes. This will also increase safety & liveability in the area, and exposure for local businesses.
- Return the tram route of the 1930s (demonstrated in 1930s tram map).
- Ensure public transport leads to community locations, eg schools, shops, universities and other public services
- Better public transport to connect nodes that are planned to be built beyond/outside prime agricultural land
- Give trains priority over railway crossings, stop cars not trains
- Have later train services
- Have off peak train fares on weekday evenings and saturdays
- Incentivise bringing bikes on buses and trains - make space and eliminate extra costs for bikes to encourage greater use of existing public transport services and combining active transport options.
- More reliable buses that run on schedule
- Bike path infrastructure leading to public transport
- Invest in rail infrastructure first and then build towns around the stations
- Invest in more greenfield spaces as a priority for all new housing developments

- Make developers accountable for including green spaces and rail infrastructures in their plans.

Better active transport

- Increase the walkability of communities, to connect people with each other and the inner workings of their neighbourhoods (street libraries, verge gardens, meeting neighbours, discovering suburban businesses etc). More people walking will lead government to invest more in green spaces.
- Prioritise people not cars - walking, bikes, ebikes
- Invest in a city and hubs that are walk and bike friendly
- Make all street crossing raised for pedestrians and cyclists - they then act as a speed bump forcing cars to slow down and takes the onus off of pedestrians and cyclists to check before going down the ramp onto the road. These are known as raised road crossings and are effective in many parts of Europe. Pedestrian crossings should prioritise pedestrians, not cars, and they should be done with actual barriers to cars, not just paint.
- Ensure bike lanes leads to community locations, eg schools, shops and services. Replicate Frome Road Bikeway where cyclists are protected from traffic by a concrete barrier, instead of sandwiched against roads and needing to ride around parked cars (like on Greenhill Road). The Greenhill Road Bike Path puts cyclists at risk. Most of Adelaide's current bike paths are like this and must be changed. We also need more bike lanes to connect all of metropolitan Adelaide, to increase cyclist safety. Bike turning infrastructure at intersections would help with this also.
- Paint is not protection - road upgrades need to accommodate for safe cycling as part of the upgrade.
- Invest in secure, under cover, monitored bike parking to protect bikes.
- Ban cars from the CBD, providing people with viable alternatives (active transport and more efficient public transport)
- Increase the annual budget spent on active transport by 1000% in the first year and 10% each following year
- Cycling 'highways' should run parallel to all the rail plines, but in green corridors visually and audibly separated from cards

- The CBD and inner suburbs should be bike safe also. Key metric: Kid friendly bike KM's.

Less cars + higher % of Electric vehicles

- Make it easier to live without a car in Adelaide, and a nicer city to be in due to less cars!
- Safer for cyclists + pedestrians
- More EV chargers in city and wider range of suburban and regional locations (including fast chargers on transit routes) and better maintained (fast chargers are often broken)
- Bigger EV charging network
- EV chargers - ensure these are easily accessible in all areas
- Ensure access to micro-mobility eg. electric scooters & electric bikes
- On-street parking transformed into bike lanes
- Enforced cap on carparks.
- Review the laws that ban the use of single person electric vehicles. Currently all electric scooters, bikes, skateboards etc are not allowed in public spaces with the exception of peddle assisted bikes limited to 15kph. This restricts our capacity for electrified, active transport, which is key for a liveable zero emissions city.
- Remove all cars from Rundle street and Rundle road as a trial of car-free streets. We already do this during Fringe so the public will find it less radical. There are many alternative routes that can be taken around Rundle Street.
- Increase cost of on-street parking to cover cost of new bike infrastructure as well as deter parking in the city.

Reduce sprawl - better, healthier living.

- Invest in medium/high density living that is sustainably built with passive heating/cooling design principles
- We have great capacity to do urban infill well, but it has historically been done very badly, leading to negative community perceptions about infill.
- We should consider legislation which accommodates more flexible living arrangements.

- Increase the amount of infill development by 1000%
- Prioritise infill over greenfield development but also investigate ways to utilise existing built infrastructure/homes (don't build for the sake of jobs/economy)
- Have jobs that let us change our goals to sustain ourselves instead of an ever growing unsustainable mass.
- Give access to mental health support mechanisms, not just cut people off from income if they make mistakes at a job. Local governments should regularly consult and report on this issue.
- Increased medium density housing near railway stations
- Parkland space for all urban development
- Review zoning laws to allow for communal areas that are within walking distance from residential areas
- Flexible zoning to include social, economic, environmental activities in the same area - ie. community garden roofs
- Making urban spaces more green with trees to reduce urban heat island effect
- Prioritise medium-density infill + brownfield development
- Define a policy for 'block-level' developments that infill whilst increasing social outcomes such as greenspace, age and diversity + community building + walkability
- No more greenfield developments: We cannot afford any more clearing of native vegetation, or endless sprawl. Where we are stuck with already existing developments, we should focus on transforming them to be optimally liveable and sustainable cities.
- We need to lift the form of greenfield that we have. Many greenfield developments are becoming separate, isolated, car dependent and unlivable. We can take inspiration from liveable communities like Aldinga eco village which is a wonderful, walkable community with a shared economy. Through education and investment into concepts like the 15-minute city, we can improve our developments.
- Culture is critical. Whilst services like schools and employment are needed, it is arts and cultural precincts which make a place desirable to live and ultimately create liveable hubs, reducing the need for all dependance on the CBD.

- Reduce unusable green space such as golf courses and race courses which do not contribute to biodiversity and only appeal to the super wealthy top percentage.
- Green spaces need to be designed with people and biodiversity at the forefront. They should enhance cooling and done at scale to help us mitigate and adapt to the impacts of climate change.
- Green spaces do not need to be ‘low maintenance’ to be worthwhile. There are tightly held and outdated assumptions that green spaces should always be passive, and thus are designed poorly with the least amount of effort possible. They should be prioritised and recognised for their intrinsic services to nature, climate, and people. Communities should be engaged with the process. Active maintenance also provides necessary jobs and thus should be celebrated.
- Adelaide should grow up, not out: limit urban sprawl but ensure it is done with the best possible outcomes for people and nature, ensuring that trees and vegetation are retained.

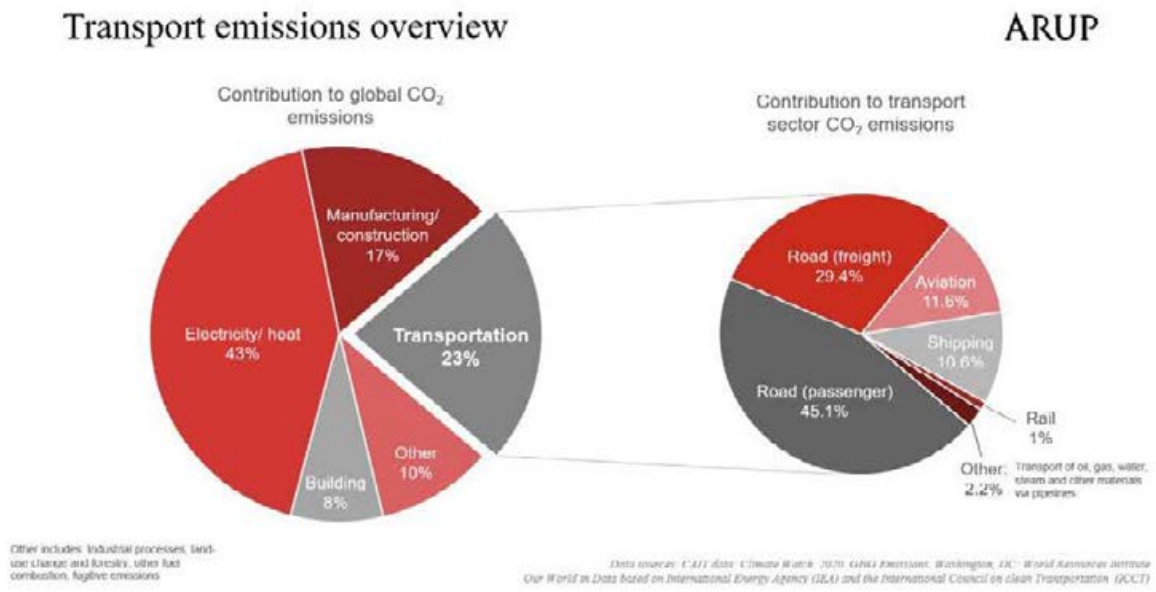
Outcomes

- European style livable city design over American car-centric forms of urban development
- City planning orientated around a carbon-restrained future
- No new coal, oil or gas development.
- End homelessness and development of a precarious cost of living indicator to drive policy decisions.
- Turn inefficient and unused offices into affordable housing. Companies could hire out spaces they need to use only when they need them, enabling more time to spend with friends and family than in commuting.
- Establish urban growth boundaries.
- Develop food security and local growing.
    - Enforce protection of prime agricultural lands on the urban fringe that are all at risk of being taken over by urban sprawl.

- Protect agricultural land.
- Have farming land interspersed with medium/high density housing.
- Food gardening brings people together, improves health outcomes, and creates more resilient food systems when natural disasters destroy widescale crops elsewhere that would be otherwise relied on.
- Have community gardens and kitchen in every suburb.

- Build a biodiverse city which actively restores habitat and helps to enhance climate resilience.

Appendix 1:



From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
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Please find attached our submission to the Greater Adelaide Regional Plan Discussion Paper.

If you have any questions, please feel free to contact me.

Regards
Mark Gishen
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SOUTH AUSTRALIAN WINE INDUSTRY ASSOCIATION

Submission in response to the Greater Adelaide Regional Plan Discussion Paper

SUBMISSION OF: SOUTH AUSTRALIAN WINE INDUSTRY ASSOCIATION INCORPORATED

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DATE: 6 November 2023

Submissions by 6 November 2023 to:
Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001
Email: plansasubmissions@sa.gov.au

ABOUT THE SOUTH AUSTRALIAN WINE INDUSTRY ASSOCIATION

The South Australian Wine Industry Association (SAWIA) is an industry association representing the interests of wine grape growers and wine producers throughout the state of South Australia.

SAWIA is a not-for-profit incorporated association, funded by voluntary member subscriptions, grants and fee for service activities. Our mission is to provide leadership, advice and support to South Australian grape and wine businesses, assisting them to prosper within a dynamic, diverse industry.

SAWIA membership represents approximately 96% of the winegrapes harvested in South Australia and about 40% of the vineyard area. Each major wine region within South Australia is represented on the board governing our activities.

SAWIA has a strong track record as an industry leader and innovator in many areas, and proactively represents members and the greater wine industry to government and related agencies on a wide variety of matters.

ABOUT THE SOUTH AUSTRALIAN WINE INDUSTRY

The South Australian wine industry is worth about $2.25 billion to the state's economy[1]. South Australia has 18 distinctly named wine regions with at least three having international recognition. South Australia is a premium wine state responsible for producing about 60% of Australia's wine production[2] (currently around 500 million litres of wine), and 80% of Australia's premium wine

South Australia has approximately 75,500 hectares under wine grapes[3], representing about 52% of Australia's vineyards, and comprise of 77% red and 23% white wine grape varieties. The total wine grape crush in 2023 in South Australia was 661,984 tonnes, 55% of Australia's crush. For South Australia, this was 14% below the 10-year average.

In the twelve months to the end of September 2023, South Australia exported 358 million litres for a value of $1.22 billion (about 70% of Australia's total value). South Australia's major export markets by value are currently Hong Kong, Singapore, UK, USA, Malaysia, New Zealand and Canada. Of international exports with a label claim from the regions of South Australia, about 70% are in bottled format, comprising over 90% of the value. Wine is currently South Australia's fourth largest single export sector. South Australian wine businesses export to about 100 countries.

In South Australia there are approximately 1,250 licensed[4] wine producers (including about 600 processing facilities, 340 cellar doors[5]) and 3,246 registered vineyard owners[6], who together directly employ around 8,990 persons[7] and indirectly support another 81,900 jobs[8].

Wine regions are a significant contributor to South Australia's tourism economy, which is currently worth around $814 million annually[9], with at least 39% of international visitors to South Australia spending time in wine regions.

[1] Primary Industries Scorecard 2021-22
[2] Wine Australia, Production, Sales and Inventory Report 2021-22
[3] SA Winegrape Crush Survey 2023, Wine Australia
[4] Consumer and Business Services SA
[5] The Australian and New Zealand Wine Industry Directory
[6] SA Winegrape Crush Survey 2023, Wine Australia
[7] Census 2021, Australian Bureau of Statistics
[8] Derived from Economic Contribution of the Australian Wine Sector 2019, AgEconPlus Wine Australia website
[9] South Australian Tourist Council (SATC) for the year ending March 2023

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SUBMISSION

The South Australian Wine Industry Association (SAWIA) is pleased to provide feedback to the Department for Trade and Investment (DTI) on the Greater Adelaide Regional Plan Discussion Paper (Discussion Paper). SAWIA notes that this Discussion Paper centres on "the features and characteristics that make the Greater Adelaide region so special" with a key feature being "our premium food and wine" (page 7 of the Discussion Paper), and that the term 'wine' is specifically mentioned several times.

1. Introduction

SAWIA has a strong interest in planning of the Greater Adelaide region because these regions contain some significant and critically important and high value wine producing regions. SAWIA has been engaged in previous consultations related to planning including the earlier 30-year Plan for Greater Adelaide (2009) and the Character Preservation Acts (2012) for the Barossa Valley and McLaren Vale regions.

2. Guiding principles for planning

SAWIA submits that planning in the Greater Adelaide regions should take into account at least the following principles and objectives:

- Ensuring the long-term protection and integrity of the areas identified as Environmental and Food Production Areas (EFPAs)
- Acknowledge and uphold the *Character Preservation (Barossa Valley) Act 2012* and *Character Preservation (McLaren Vale) Act 2012*
- Accepting that the financial and employment contribution of vineyards and wineries to the State is considerable and when wine and tourism are considered this will often far outweigh the apparent value of vineyard land
- Recognition of the 'right to farm' where new residents and new users of existing land understand they inhabit area within an agricultural land protection area where the viability and sustainability of agriculture importantly comes first
- Ensuring sound environmental requirements for all new development
- Identifying and maintaining the rural character and landscape of a region acknowledging it as a desirable place to live and providing an outstanding quality of life within world recognised wine regions
- Minimum sized land allotments and town infill will be the natural means of determining the population projections for a given agricultural land protection area
- Recognition that agriculture is the principal user of ground water with data collection and long-term monitoring required to ensure quantity and quality supplies of water remain available
- Development must allow for access to a sufficient quantity and quality of water and infrastructure to sustain community and wine industry pursuits
- Providing for a transparent and fair mechanism that provides appropriate checks and balances if existing protected land is to be considered for re-zoning.

3. Response to the Discussion Paper

SAWIA's responses to some of the specific matters raised by the Discussion Paper are outlined below.

Housing needs projections

The Discussion Paper presents a target for an increase of 300,000 homes in the Greater Adelaide region based on a population increase of 46% over the next 30 years (p. 14). Whilst a footnote

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indicates that this is "Based on 2021 Census data", we were unable to identify any further detail or explanation about how this figure was determined, nor what underlying assumptions may have been used if any. It is important to have a clear understanding of the likelihood of such growth for SAWIA to consider if the proposals that follow are appropriate. SAWIA suggests that this should be better explained in subsequent consultation on a draft Greater Adelaide Regional Plan in mid-2024.

Protection for Environment and Food Production Areas (EFPAs)

The Discussion Paper points out (p. 104) that "EFPAs protect our prime food and wine regions and natural resources from urban encroachment. EFPAs primarily preclude land division for residential development."

SAWIA is deeply concerned that the Discussion Paper then appears to open the possibility for those EFPAs to be developed through making variations to the EFPAs: "if a 15-year supply of urban land cannot be identified outside those areas." SAWIA suggests that this creates uncertainty for the community and the wine industry, which could be avoided by seeking to prioritise increase in density through infill as a first step. It is also unclear as to what the Commission defines in the plan as "smaller townships" (p. 103) and why only two specific places were mentioned – this requires further explanation to provide clarity.

A clearer statement about protection of EFPAs is required in the Plan.

Satellite city growth

SAWIA is aware that the current high demand for housing is already impacting the grape and wine production sector in terms of housing its workforce. Therefore, the focus on housing growth in satellite cities (Figure 9, p. 126) is broadly welcomed, as it offers the potential to provide housing in relative proximity to wineries and vineyards. However, it is important that planning should actively discourage any such growth that results in further encroachment on productive high value farming land, especially vineyards.

SAWIA is pleased that the Commission recognises the value of heritage and character areas and the necessary role of "greenbelts" to provide for "inter-urban breaks" (p. 103) and considers that this should be translated to increase infill development within the satellite cities rather than ongoing 'sprawl'.

Biosecurity

SAWIA is disappointed that 'biosecurity' has not been mentioned at all in the Discussion Paper and must be urgently addressed in further development of the planning for the Greater Adelaide region.

Urbanisation is a key challenge for the biosecurity of South Australia's vineyards. The CSIRO[10] has noted that "ongoing expansion of cities is changing interactions between people, wildlife, agriculture and disease vectors; potentially increasing risk of spreading pests and diseases across these boundaries. Fast growing peri-urban regions are also a source of new pest and disease risk as they are often under stewardship of inexperienced or under-engaged owners."

Breaches of biosecurity can have significant detrimental financial and social impacts on agricultural production systems and communities. It also places increasing resource demands on governments and their agencies for monitoring, enforcement and public awareness campaigns. It is therefore

[10] Australia's Biosecurity Future, 2020; accessed online 6 Nov 2023

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critical that this be considered when planning any population and housing growth in or near to high value agricultural activities.

Infrastructure

The Discussion Paper cites (p. 95) work that shows that "land development costs in urban and township extension areas can be significantly higher than land development costs in established residential areas", which suggests that increasing housing density in established areas is the most cost-efficient means of increasing housing. SAWIA understands that the Commission's work in this area is ongoing with Infrastructure SA (ISA) and it will be important to see all the supporting data and evidence that those works may bring once complete.

Further, increased population and development in satellite cities (as already discussed) will put greater pressure on the need for infrastructure improvements, especially roads. This will become especially important to service workers commuting to agricultural-based workplaces such as vineyards and wineries.

Next steps

SAWIA looks forward to involvement and engagement with the processes of the development of the plan. In the first instance, to receiving the 'What We Have Heard report and draft directions' arising from the consultation on the Discussion Paper, and secondly being involved with the activities planned for Stage 2 of the process.

Please feel free to contact SAWIA for further information or any questions regarding this submission and future consultations.

End of submission

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DTI:PlanSA Submissions

From: Elizabeth Rushbrook <[redacted]>
Sent: Sunday, 5 November 2023 10:34 AM
To: DTI:PlanSA Submissions
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: The Greater Adelaide Regional Plan Discussion Paper-Submitted 51123.pdf

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Dear Mr Holden
I am attaching SECRA's submission to the Greater Adelaide Regional Plan, which suggests that liveability should be a criterion for future SA development.

Kind Regards

Elizabeth
[redacted]

SECRA
SOUTH EAST CITY RESIDENTS ASSOCIATION

The Greater Adelaide Regional Plan Discussion Paper
The Chair
State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

By email: plansasubmissions@sa.gov.au

Re: The Greater Adelaide Regional Plan Discussion Paper (GARP)

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan Discussion Paper. Members of the South East City Residents Association (SECRA) committee have attended the Chair of the Planning Commission's presentations and read the discussion paper and summary. This response has been prepared with the assistance of a subcommittee drawn from members.

1. SECRA is an incorporated voluntary body with a membership of approximately 100 residents, which has the following objectives
    a. To promote the interests of the residents of the South-East Precinct of the City of Adelaide and adjoining areas.
    b. To preserve and enhance the inherent character and heritage of the neighbourhood, including the adjacent area of parklands and Victoria Park.
    c. To support the provision of local retail and service facilities whilst retaining the village atmosphere of Hutt Street.
    d. To determine the policy of the Association about matters affecting the South East Precinct.

OTHER INITIATIVES

2. At the same time GARP was released for comment, similar planning initiatives are being undertaken by other bodies, such as the City of Adelaide's *City Plan*[1] and Infrastructure SA's South Australia's *20-Year State Infrastructure Strategy Discussion Paper*.[2] These reports will likely impact and influence each other and will be hard to separate. Representatives from SECRA are likely to contribute to a response to these documents also.

[1] Refer to https://www.cityofadelaide.com.au/about-adelaide/city-plan/
[2] Refer to https://yoursay.sa.gov.au/state-infrastructure-strategy-url.

3. SECRA remains hopeful that the government response to the Expert Panel report will be released soon, addressing issues such as restoring third-party appeal rights and improving the opportunity for public notification and submissions for development applications.

CONTEXT

Growth estimates

4. SECRA understands that GARP is primarily concerned with land supply issues for housing and employment beyond the next 15 years when it runs out of sufficient land.[3] It replaces the existing 30-year plan for greater Adelaide, which was updated in 2017.[4]

   Underpinning the report is the view that Regional Adelaide will experience high population growth, with an additional 670,000 people and requiring 300,000 new homes by 2051.[5]

5. SECRA is not convinced that Adelaide will experience a high growth scenario based on our historically lower growth rates of around 1%.[6] However, rather than debate population growth figures some 30 years in advance, SECRA is willing to assume the estimated high growth rate provided in GARP. We recognise that population forecasting is problematic, given that it combines rapid changes (such as the impact of COVID-19) and more gradual changes (such as birth rates). Obviously, some elements are more predictable than others.[7] SECRA would prefer that the report contain scenarios for low, medium, and high growth rates to be of greater value in future planning.

GARP

6. SECRA notes that the report does not explicitly mention any impact on the City of Adelaide and future land supply. However, we wish to comment on several concepts and principles in the discussion paper pertinent to the South East Corner (SEC). The SEC is defined as Wakefield Road in the north, East Terrace in the east, South Terrace in the south and Pulteney Street in the West.[8]

7. We believe these are relevant to the broad issue of how to accommodate substantial population growth in the city in an era of global heating while preserving and hopefully enhancing liveability. For example, within Priorities and Directions, a Greener, Wilder and Climate-Resilient Environment, there was an aim to capitalise on growth in areas with existing open space networks

[3] *Greater Adelaide Regional Plan Discussion Paper Summary,6.*
[4] The *30 Year Plan for Greater Adelaide* can be found at https://livingadelaide.sa.gov.au/.
[5] *Greater Adelaide Regional Plan Discussion Paper 14.*
[6] *Greater Adelaide Regional Plan Discussion Paper 14.*
[7] *Nicholas Eberstadt and Richard Haasls Population Change a Problem? at*https://www.cfr.org/podcasts/is-population-change-a-problem
[8] See id (informed decisions), at https://forecast.id.com.au/adelaide/about-forecast-areas.

in the CBD, along river corridors and near major urban parks. As the south-east of the city is near Victoria Park, the largest urban park within the Adelaide Park Lands system, and Parks 15, 17 and 18 on its borders, this statement is relevant to SECRA.

INFORMED DECISION ESTIMATES

Growth

8. These estimates by Informed Decisions provide localised information. Regarding the SEC,[9] it shows that the population will grow by 43.14%, bringing an additional 1787 people to the area.

South East Corner (SEC)	Estimated population in 2023	4227
	Estimated population in 2041	6014
	Estimated growth	43.14%

9. Moreover, this growth is inconsistent throughout the SEC, meaning that any future growth in the SEC will be uneven throughout the area.[10]

Density

10. The SEC area has the highest density in Adelaide. By comparison, the City of Adelaide has an overall density of 1,679 persons per square kilometre. The SEC of the city has a population density of 5,085 people per square kilometre who mainly live in low-rise buildings. SECRA believes that this demonstrates that higher population densities do not necessarily mean high-rise buildings.

Historical Buildings

11. SECRA supports GARP in its support for the preservation and, in some cases, repurposing of historic residential and industrial buildings of architectural and heritage value and their gardens for future generations.[11] This requires changes to the current policies on demolition and heritage buildings. To this end, SECRA, in conjunction with the City of Adelaide, seeks to re-evaluate the 37 properties rejected by the Environmental Resource and Development Committee of the State Parliament in 2013 for local heritage listing when approving the City Centre Heritage Development Plan Amendment.[12]

[9] Id (informed decisions), at https://forecast.id.com.au/adelaide/about-forecast-areas?WebID=140.
[10] Refer to Population Experience at https://experience.arcgis.com/experience/573f9c20fe0d44a2a43196633244ce43.
[11] See Adaptive Reuse prority, *Greater Adelaide Regional Plan Discussion Paper 59.*
[12] See letter from SECRA to the Minister for Planning, 13 March 2023.

Disadvantage

12. The SEC has a significant level of disadvantage as measured by the Socio-Economic Indexes for Areas.[13] Some areas in the SEC have a 960 index, below the 1002 average index recorded across the City of Adelaide, reflecting its higher levels of disadvantage. Therefore, our land use supports the Hutt Street Centre, Catherine House and related services, public housing, and other social justice initiatives within our community. SECRA welcomes this diversity within the SEC and notes that some new large developments along East Terrace are luxury apartments[14] housing relatively few people. In contrast, other significant developments, such as the Ergo apartments, offer a range of housing options to a greater number of people.[15]

RESPONSE TO A GROWTH AGENDA

13. SECRA sees the SEC as a distinct area from the CBD area, forming one of the four urban villages in the City of Adelaide. Should this level of growth eventuate, SECRA would want it to retain its 'urban village' atmosphere. In this regard, the SEC may usefully exemplify a mix of housing types, living locally and liveability, that may have been lost in many significant developments.

14. GARP suggests that four outcomes should underpin future development. SECRA supports these outcomes. They are

    a. A greener, wilder, and climate-resilient environment
    b. A greater choice of housing in the right places
    c. A strong economy built on a smarter, cleaner, regenerative future
    d. A more equitable and socially - cohesive place.[16]

    SECRA has worked with others to progress some of these aims and looks to continue this role. While these outcomes are relevant to the future, they also underpin current land use.

15. As an example, SECRA already implements elements of the first objective, 'A greener, wilder and climate-resilient environment,' as outlined below:
    a. Initiating a volunteer group, Green Pakapakanthi, to assist in providing tree canopy to Victoria Park/Pakapakanthi users.

[13] The City of Adelaide Socio-Economic Indexes for Areas (SEIFA) measu The Environment, Resources and Development Committee of State Parliament reviewed the DPA in April and May 2013 and allowed the DPA to proceed with no changes. This means the DPA is finished with the outcome that 37 of the proposed 78 buildings were local heritage listed. A illustrated report of the 41 buildings is below. re the relative level of socio-economic disadvantage and/or advantage based on a range of Census characteristics

[14] See 'Eye-popping penthouse' in *The Advertiser*, Tuesday October 10 2023.

[15] See https://axiomgroup.com.au/projects/ergo-apartments.

[16] *Greater Adelaide Regional Plan Discussion Paper Summary,9.*

b. Applying a citizen science approach to the development of new ways to develop understory in Victoria Park, which could be implemented in other urban parks.
c. Responding to the effects of climate change and the impact on the liveability of SE residents, such as the effect of Adelaide 500.
d. Working with the Transport Action Network to develop an integrated public transport system by holding public forums.
e. Advocating for active transport users, whether they walk, cycle, use mobility aids or have young families, in various forums, including the Lord Mayor's Hutt Street Roundtable.
f. Advocating for liveability through taking up issues of importance to our members, including removing catalyst sites.

16. SECRA also supports the acknowledgement of the impact of climate change,[17] noting that it 'impacts all areas of our society.'[18] A significant contributor to climate change is the greenhouse gases emitted by cars.[19] We are particularly concerned about the dominance of vehicles in our community and support active transport, such as people who walk, bike, or use public transport. SECRA notes that when residents move into the city, their car ownership lowers. Some 14% of the City of Adelaide residents[20] work or study outside of Adelaide, and only half of the residents in Adelaide now have a car[21], decreasing greenhouse gas emissions.

17. Despite this pattern of the use of cars by residents, there are difficulties in obtaining visitor car parks and finding accommodation with sufficient car parks. This is a significant challenge for the City of Adelaide, which relies on car parking for much of its revenue. The Commission may wish to work with the City of Adelaide to implement a range of policies to reduce the number of cars in the city and enhance liveability as the population grows.

18. SECRA is aware that governments are hard-pressed to maintain and upgrade infrastructure for our current population increase. It would, therefore, be hard to envisage how we could provide infrastructure growth to sustain higher annual population growth in greenfield sites, for instance. Thus, while the cost of such assumptions is contestable, infill and city

[17] The United Nations 'Climate change refers to long-term shifts in temperatures and weather patterns. Such shifts can be natural, due to changes in the sun's activity or large volcanic eruptions. But since the 1800s, human activities have been the main driver of climate change, primarily due to the burning of fossil fuels like coal, oil and gas' at https://www.un.org/en/climatechange/what-is-climate-change.
[18] *Greater Adelaide Regional Plan Discussion Paper, 42.*
[19] UN, *What is climate Change*? https://www.un.org/en/climatechange/what-is-climate-change.
[20] *Adelaide City Living Market Research Vol 3 Adelaide City Residents,18.*
[21] *Adelaide City Living Market Research Vol 3 Adelaide City Residents,41.*

development become particularly attractive. SECRA is working with other groups with a proposal to improve public transport connectivity within regional Adelaide. A joint submission to the revised 20-Year State Infrastructure Strategy may further this initiative.

19. SECRA strongly advocates for the Adelaide Park Lands system, which provides green open space to the SEC on the east and southern boundaries. The parklands improve residents' health and provide both environmental and economic benefits. [22]

LIVING LOCALLY

20. One set of objectives that SECRA supports is living locally.[23] SECRA is particularly pleased to see a sense of community included in this assessment, as the definition of living locally and liveability has moved beyond transport issues customarily put forward by the planning profession.

    Looking at some of the nuances, when residents decide to live in the city, they value the ease of walking around, many parks, trees and tree-lined streets, cafes, chemists and other services, along with being safe and secure. What they disliked about living in the city was the noise and lack of car parking.[24]

    The residents living in high-rise apartments are attracted by the low maintenance required by their accommodation, closely followed by the 'lock up and leave' factor. The lack of car parking for visitors was the least attractive feature of living in a city apartment.[25]

LIVEABILITY INDEX

21. SECRA supports resident-centric planning, switching planners' focus to broader concerns beyond population size and growth. Several methods can be used to benchmark Australian cities and establish a liveability index for each city and subdistrict.

22. These indexes recognise that different people in different places will have different opinions regarding what contributes most towards making a good place to live and how they perceive their experience. An example is below, where residents may have differing views on ranking various elements of a liveability index. [26]

---

[22] City Park Alliance, *City Parks Are a Smart Investment for America's Health, Economy, & Environment at* https://cityparksalliance.org/wp-content/uploads/2022/05/CPA_3-Infographics_2022.FINAL_.pdf

[23] *Greater Adelaide Regional Plan Discussion Paper Summary,15.*

[24] *Adelaide City Living Market Research Vol 3 Adelaide City Residents*, Executive Summary, 3.

[25] Ibid, 4.

[26] *Understanding Liveability to Advance Quality of Life – Important Considerations*, id (informed decisions).

Attributes of liveability that the SEC is likely to meet	Uncertain if the SEC meets these attributes	The SEC may not meet these attributes
High-quality health services	Affordable, decent housing	Affordable, decent housing
Access to the natural environment	Prosperous economy	Opportunity for all
Strong sense of community	Reliable and efficient public transport	Social cohesion
Cultural facilities	Good job prospects	
Ability to view and participate in sports and recreation	Lack of road congestion	
High-quality educational facilities	Travel to services easily	
A diverse range of shopping, leisure, and dining experiences		

23. Considering the interaction of these elements, SECRA believes that putting residents' values and experiences at the centre of any attempt to understand liveability and advance the quality of life is appropriate–and necessary – to deliver growth policies that create meaningful impact for the community. There is a tendency for government plans to have a developer mindset and, therefore, a bias towards the development process, which could easily result in a "skewed" approach. For example, housing should not be adjacent to existing parks without the appropriate conditions, such as it does not restrict, dominate, or detract from the public's access and use of the park or river corridor.

24. SECRA prefers a resident-centric approach rather than a place-based approach to local planning, which is essential to retain the high level of liveability in the SEC and may be successfully attained in low to medium-rise residences. [27] The missing component, though, is the impact of higher development on existing communities. With a program of benchmarked residents' liveability assessment, it can now become part of the planning

[27] ABS classifies apartments in the following way - low rise (1 to 3 storeys); medium rise (4 to 8 storeys); high rise (9 to 19 storeys); and super high rise (20 or more storeys) at https://www.abs.gov.au/ausstats/abs@.nsf/Lookup/8752.0Feature+Article1Dec%202018.

process, which can move towards co-planning in areas such as the SEC to achieve the desired increase in population in this wonderful part of the city.

CONCLUSION

25. The government sector's need for credible, genuinely representative insight has never been greater. Residents, other levels of government and even the private sector are placing higher expectations on governments to ensure that their community's views are more comprehensively incorporated, monitored, and ultimately evaluated in government strategic planning and advocacy.

    However, SECRA is concerned that a doubling in growth in the SEC may not be achieved without unacceptable detriment to liveability, the environment, heritage, and amenities of the area. Therefore, SECRA's response to the question of where the growth should go in the SEC is that it depends upon the retention or improvement of the liveability of our residents.

SECRA is willing to discuss these ideas further with the Commission. First, could you please contact Elizabeth Rushbrook by email at [redacted].

Yours sincerely

[redacted]

Doug McEvoy AM

Chair
SECRA

Date: 4 November 2023.

DTI:PlanSA Submissions

From: ST PETERS RESIDENTS ASSOCIATION <[redacted]>
Sent: Monday, 6 November 2023 2:12 PM
To: DTI:PlanSA Submissions
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: Greater Adelaide Regional Plan SPRA submission.pdf

Follow Up Flag: Follow up
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ST PETERS RESIDENTS ASSOCIATION INC.

E-mail info@stpeters.asn.au
Representing the Residents of St Peters, College Park, Hackney, Stepney, Maylands, Evandale & Joslin.

Please find attached the St Peters Residents Association submission on the Greater Adelaide Regional Plan Discussion Paper.

David Cree
President

****

St Peters Residents Association Inc
info@stpeters.asn.au
****

ST PETERS RESIDENTS ASSOCIATION INC.

E-mail : info@stpeters.asn.au **ABN 86 794 177 385**

Representing the Residents of St Peters, College Park, Hackney, Stepney, Maylands, Evandale & Joslin.

SUBMISSION TO GREATER ADELAIDE REGIONAL PLAN (GARP)

General Comments

The St Peters Residents Association (SPRA) notes that immigration is running at a very high level, with Australia leading the world in its rate of immigration-induced population growth. An extra half a million people were added in the past 12 months. This is putting enormous pressures on our cities and housing supply with soaring rates of homelessness and people unable to find rental accommodation. While we understand that the State Planning Commission (SPC) has no control over our population growth, we submit that as the State's key land use planning body, it has a responsibility to report to the State Government on community concern over large pressures on our land supply and housing needs.

We appreciate that household formation rate, as well as population growth, impacts on demand for new housing. However, community concern over population growth cannot forever be swept under the carpet. The forecasted need for an extra 300,000 dwellings in the Greater Adelaide region over the next 30 years demonstrates a need for a major increase in our current housing stock. Extra housing will be traded off against residential amenity, the natural environment, open space, agricultural land and the tourism attractions of this State. Politicians may think endless population growth is a good thing, and that you can maintain an ever-growing population while achieving a better environment, but public servants and members of Planning Commissions have a duty to remind them of reality and the costs which non-stop population growth brings.

The Discussion Paper suggests we plan to accommodate a high population growth projection of 670,000 for Greater Adelaide by 2051. However, a median growth projection of about 500,000 may be more plausible. Undue pressure may be placed on agricultural land, employment lands, the environment and open space by planning for the highest population growth projection.

SPRA is pleased that the SPC is proposing to spread the burden of extra new dwellings which may be needed in this State over the next 30 years. Spreading the load between infill housing, some greenfield site development and satellite cities is a good thing. However, we note that although the targeted burden falling on the existing suburbs for new infill has fallen from 85 per cent of new housing to 70 per cent, this is still a high proportion of the new housing to be built.

We support more emphasis on selecting sites for Strategic Infill rather than piece-meal, ad hoc infill. We value the Discussion Paper's recognition of the importance of protecting historic

and character residential areas. It is important that infill housing does not undermine the valued character of these areas.

SPRA submits that before any more land is re-zoned in the Norwood Payneham and St. Peters Council area, land that is already zoned to allow multi-storey infill apartments should be used up. This land includes the southern side of North Terrace Kent Town and The Parade Norwood, as well as parts of Kent Town. Post-war suburbs in the Payneham/Firle areas also allow for up to three storey residential development which has generally resulted in two storey development. Multi-storey housing developments on The Parade should adhere to height limits in the Planning and Design Code as High Streets like The Parade require sensitive development which does not overwhelm the human-scale street level shopping precinct which attracts many visitors and tourists.

We understand that three types of infill, and sites suitable for them, are to be investigated by the Commission. These are **Strategic Infill, Corridor Growth and Neighbourhood/Centre Infill**.

Areas denoted for possible **Strategic Infill** Sites include the Stepney Triangle, a light industrial area containing a few remnant 19th century cottages, many businesses and two three storey apartment blocks. Now classed as an Employment Zone, the Stepney Triangle supports a range of food and beverage manufacturing businesses which have increased in number in recent years. These businesses are likely to be forced out of the area if it is re-classified to a Strategic Infill site.

Areas to be investigated for possible **Neighbourhood/Centre Infill** include land formerly used by the Department of Transport for a carpark next to the River Torrens and adjacent to the River Torrens Linear Park. This land, off Holton Court St Peters, is in an area rich in urban wildlife (including koalas). The Norwood Payneham & St Peters Council has approached the government in the past with a view to adding this land to the open space next to the Torrens River. A large infill apartment complex on this sensitive riverine site has the potential to add a great deal of pollution to the river and to decimate the local environment and its wildlife. We also understand that the former Department of Transport carpark is built on fill, due to the history of sand and gravel mining along the River Torrens, followed by its use as a rubbish dump. This land should be added to the Linear Park and MOSS.

The Caravan Park on Richmond Street has also been suggested as a site for Neighbourhood/Centre Infill investigation. An error has been made in the mapping of this site. The detailed Commission map shows the area includes the adjacent Twelftree Reserve, a public park owned by Norwood Payneham & St Peters Council. This should be corrected.

The Caravan Park site was zoned for multi storey redevelopment under former Planning Minister John Rau. Caution should be exercised in approving multi-storey residential development on this site, particularly towards the river cliff face at the rear of the site. These cliffs are not stable, and any housing development should be set well back from the cliff face. In nature, cliffs erode due to wind, rain and earth movements and it may not be wise to try to pin them down in the one place with overly enthusiastic large housing developments.
However, there should be provision made for the continuation of the Linear Park walking / cycling track along the riverbank behind the caravan park. The lack a track requires walkers and cyclists to cross the river or to negotiate the narrow Richmond Street in Hackney.

In relation to **Neighbourhood Infill**, we urge the Commission to tighten up controls on so-called “normal” infill, as this is uncoordinated and ad hoc, which often inflicts significant amenity and environmental costs on neighbours and local areas. These costs are outlined later in this submission.

Corridor growth infill on arterial roads to be investigated include all of Payneham Road, Magill Road and Kensington Road. We submit that these roads adjoin many Historic Overlay and Character Overlay Areas that are full of historic and character garden suburbs with predominantly single storey dwellings set in relatively spacious gardens. With properties fronting these main roads being largely single allotments there will not be enough space, in many cases, for multi-storey apartment dwellings to be erected.

Proposed areas of investigation for **“Mass Transit”** include Magill Road, The Parade and Kensington Road. These roads are congested at peak periods. It is not clear what “mass transit” involves.

This Discussion Paper should be integrated with the recently released Infrastructure Plan, as well as with a Transport Plan. Coordinating the provision of infrastructure with land use planning is critical.

We submit that local councils should be involved in the scoping for detailed investigations into future housing development land. Local knowledge and support are important. Good design principles for new housing are also important and should be included in the Planning and Design Code.

Questions from the GARP Summary Paper

How can greenfield development achieve an urban form that is consistent with the principles of Living Locally?

- A range of dwelling accommodation types including detached dwellings, row housing and low-rise (3-4 storey) apartments is desirable but please don't stack 10-12 storey flats on to greenfield sites. Good design is important.
- There is a need to attract commercial activity without detracting from residential amenity. You need a good economic base otherwise you will have to admit that the Living Locally is a pie-in-the-sky ideal.
- Needed will be land for public open space so that good parks, lakes and local sports and entertainment support Living Locally and reduce the need for residents and workers to travel long distances.
- Reliable public transport is essential.

What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?

- A variety of housing types in different areas.
- Historic and character areas to be protected.
- Substantial street trees and parks are a must.
- Better public transport.
- Row housing, along with detached housing, semi-detached dwellings and low-rise apartments.
- The historic character of these towns must be protected to support the tourism industry and the preferences of residents.
- Don't built 10 storey blocks of flats in them.
- Good design will be essential for new housing.

What do you see as the benefits and potential drawbacks of greenfield development?

Potential benefits:

- Greenfield development will provide detached houses (hopefully with gardens and trees) for families to live in (children can play safely in rear gardens without adult supervision).
- Detached dwellings are most popular for people raising children.
- More choice of housing types and site areas (hopefully not all tiny allotments with cheek-by-jowl housing).
- Cheaper (in the short-term)

Potential drawbacks:

- Poor quality design.
- Small allotments and dwellings crammed together with little room for trees or gardens and little space for street trees.

- Loss of mature trees and wildlife as trees are cut down to make way for new development. Every effort should be made to retain established trees and to develop around them.
- Loss of agricultural land.
- Greater distances to travel to work and shopping if few job opportunities are available and local shopping choices are restricted.
- Need for more infrastructure including public transport, child care, schools, medical facilities, roads, water, sewerage, electricity, street trees.
- Perhaps more social isolation until strong sense of local community developed (a big role for local councils).
- Loss of character of small towns if greenfield development result in what is termed "sprawl" and small towns are linked up becoming one big urban conglomeration.
- Should be green belts between small towns and these should be protected from residential development.
- The British manage to protect their small towns with green belts so we should learn from overseas experience.

Where is the next generation of strategic infill sites?

- There are many former light industrial areas in the western suburbs and some of these should be suitable for Strategic Infill development.
- Examples include the former Coca Cola site, Bowden-Brompton and parts of Port Adelaide.
- The Elizabeth Shopping Centre has been suggested too as suitable for a major Centre infill re-development.

How can infill development achieve an urban form that is consistent with the principles of Living Locally?

- Strategic infill is more desirable than piece-meal infill as it is better planned and designed and may have more government oversight over it.
- Can live and shop and even recreate locally but needs to be near centres of economic activity (Even Bowden-Brompton residents probably have to leave the site to go to work)

What do you see as the benefits and potential drawbacks of infill development?

Potential benefits: **Ad hoc infill**:

- More dwellings

Potential drawbacks: **Ad hoc infill**:

- Loss of trees, loss of gardens, loss of open space, loss of urban wildlife (birds, possums, lizards etc.), hotter microclimates in summer, more noise (especially from backyard (hammerhead, battle-axe development), more conflict between neighbours
- More cars parked on streets and less parking available for visitors and tradesmen, more driveways across footpaths and less space available for street trees,

- Extra load on existing infrastructure (water, electricity, roads) .
- Extra stormwater for councils to dispose of means they will have to invest huge sums of money (usually borrowed) into laying bigger water pipes underground.
- May be poorly designed.

Potential benefits: Strategic Infill:

- More dwellings, more coherent in style, well planned.
- Stormwater usually recycled.
- Better landscaping and open space provided.

Potential drawbacks: Strategic infill:

- May require heavy government subsidies (eg Bowden-Brompton).
- May be relatively isolated from surrounding neighbourhood, extra loneliness of the older apartment-dweller.
- Needs to be well integrated with transport and infrastructure planning.
- If imposed from on high may not be popular in a local community.
- Need to negotiate with local community, where possible.

What are the most important factors for the Commission to consider meeting future demand for employment land?

- Population growth and distribution
- Work from home trend
- Type of industry/commercial development doing well/diminishing
- Transport networks.

What are the most important factors for the Commission to consider meeting future demand for open space?

- Population growth and size
- Climate change (urban heat island effect when vegetation is replaced with buildings)
- Demographics
- Changing technologies
- Rate and amount of housing densification
- Urban biodiversity needs (noting that biodiversity is in decline across Australia).

DTI:PlanSA Submissions

From: Ben Sarre [redacted]
Sent: Wednesday, 1 November 2023 3:31 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: 231101 Submission to Greater Adelaide Regional Plan - The Cottage Homes Inc.pdf

> You don't often get email from [redacted]. Learn why this is important

Please find attached The Cottage Homes' submission regarding the Greater Adelaide Regional Plan Discussion Paper.

BEN SARRE
Executive Officer
[redacted]
cottagehomes.org.au

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1st November 2023

Attention: Growth Management Team, Planning and Land Use Services
Via Email: plansasubmissions@sa.gov.au

To the Growth Management Team

Re: Submission – Greater Adelaide Regional Plan Discussion Paper

Established in 1872, independent social housing provider, The Cottage Homes Inc is pleased to provide feedback on the Greater Adelaide Regional Plan Discussion Paper. The views expressed in this submission reflect the views of the Board of The Cottage Homes Inc (TCHI).

Background

- TCHI provides social rental housing to older persons on the Age Pension. As such, the views in this submission relate to planning for affordable housing for older people.
- TCHI owns 129 single bedroom units, located on 7 sites across metropolitan Adelaide. This submission relates to TCHI's experience in metropolitan Adelaide.
- All of TCHI's residents are eligible for the Age Pension. As such, this submission relates to low (fixed) income households.
- The average age of TCHI residents at the time of entry is 71 years. TCHI residents range in age from 68 to 96 (ave age 80 years). This submission relates to older people.
- At the time of this submission, TCHI's 129 units were occupied by 126 single people and 3 couples. As such, this submission primarily relates to single person households.
- Over the past 5 years, TCHI 'turns over' 10 units each year (on average).
- TCHI is not a registered Community Housing Provider. TCHI is not an aged care provider or retirement village operator.
- TCHI is a registered charity and not for profit, independent housing provider.

Availability of Affordable Rental Housing Relative to Older People

- TCHI does not widely promote its housing services. Despite this, TCHI has a waiting list equivalent to 8 – 10 years of available units (based on 10 vacancies per year).
- In the past 12 months, TCHI received over 100 enquiries from eligible older persons seeking affordable rental accommodation.
- An increasing number of enquiries are coming from older people who have a long and excellent rental history in the private market. Weekly rent charges have been escalating to a point where it is no longer affordable for older people on the Age Pension, and they are 'forced' to move out and seek cheaper housing.
- An increasing number of enquiries are coming from older people who, at the time of enquiring, are living with an elderly sibling, adult child, or elderly friend or relative. This is often reported as placing stress on the older person, and the person/family providing them with temporary accommodation.

In summary, more affordable rental housing is required for older, low-income people and this housing needs to respond to single person households in a way that socially connects them in good locations within walking distance of shops and services.

Outcomes for the Greater Adelaide Regional Plan (GARP)
The GARP Discussion Paper clearly identifies several demographic factors which emphasise the importance of planning for housing for older people. These include:

- Nearly 20% of the population are aged 65+ years.
- 75% of the housing stock is detached dwellings.
- 78% increase in single person households (a typical household type for older people)
- 52% increase in couples with no children (a typical household type for older people)

HOW should Greater Adelaide grow?
TCHI notes that two of four outcomes of the GARP speak directly to the need for housing:

1. A more equitable and socially cohesive place; and
2. A greater choice of housing in the right places

As stated in the GARP Discussion Paper, both of these outcomes have shared trends and drivers, notably:

- Housing availability and affordability
- Liveability
- Social inequality

Feedback from TCHI residents indicates the following:

- Social isolation for older people can be challenging. TCHI provides housing in 'community' settings of between 10 and 27 units which helps address isolation and builds community amongst residents.
- Safety and security for older people is important. Living in small communities of older people (all TCHI residents are at least 65 years of age) in a similar stage of life can offer peace of mind for residents.
- TCHI units are single bedroom, and typically between $50m^2$ – $55m^2$ in floor area. The units are of a size that is manageable for an older person to maintain.
- TCHI communities are in 'garden settings' enabling residents to maintain their garden if they wish (contract gardeners are also engaged to maintain grounds). The opportunity to work in their garden is important for residents' physical and mental wellbeing.
- Easy access to relevant services and facilities is important, such as health, medical, shopping, community, and dining. Being within a short drive, public transport ride or walk is crucial for older people's ability to access these much-needed services.

The option of well-located, easy to maintain units, grouped together in garden settings, and offered at an affordable rent, is important for older people on the Age Pension. TCHI understand that this type of housing option is not widely available in metropolitan Adelaide.

This speaks directly to the concept of Living Locally as expressed in the GARP Discussion Paper. The future urban form for metropolitan Adelaide must be one where older, low-income people are housed affordably and suitability in community settings which facilitate their connection to people and key services. The Living Locally principles of affordable living, housing choices for all stages of life, public transport options, sense of community, walkability and safe streets and spaces are critical for older people on low incomes.

We note the recent attention to 'granny flats' as an alternative to increasing the supply of affordable rental accommodation in established urban areas. Granny flats are a valuable form of housing; however they can be isolating and our experience is that older residents prefer to live in a community setting to encourage interaction, reduce loneliness and create interdependency for mutual benefit.

<u>WHERE</u> should Greater Adelaide grow?
To provide the quantum of housing that Greater Adelaide needs to cater for future demand, new housing must be delivered in both greenfield and urban infill areas. All growth, whether greenfield or urban infill, needs to consider the housing needs of low-income older people.

TCHI believes that specific planning consideration must be given in order to ensure the adequate provision of suitable affordable housing for low-income older people. Specific planning considerations are summarized in the table below:

Alternative	**Change Required / Government Assistance**
Strategic infill sites	Selected sites which cater for a minimum of 10 dwellings, be identified and 'protected' by planning requirements, to deliver affordable rental housing for older people.
Co-Housing and Co-located Housing	Changes to planning code to permit multiple independent occupancies within established housing zones. Secured via Land Management Agreements to prevent leakage to non-vulnerable tenants with higher impacts on local amenity (noise, parking, etc.). Co-Housing for older people is an effective in-fill development strategy, leveraging established infrastructure and services, while maintaining existing streetscapes.
Redevelopment	Codify car parking discounts, and other planning concessions for aged accommodation providers. Codify established higher densities flowing to adjacent sites purchased to amalgamate with established sites held by providers such as TCHI with charters and/or Land Management Agreements that "lock in" tenant profiles and land use.
Smaller dwellings in well-serviced locations	Changes to the planning code to enable smaller units to be constructed in well-located urban areas, close to shops, services and transport options, throughout metropolitan Adelaide.
Land-leases	Establish clear and viable planning frameworks and zoning for land lease communities for aged cohorts (over 55s) as in other states.
Greenfield developments	Masterplanning for greenfield land releases to incorporate specifically identified and protected development sites, to deliver affordable rental housing for low-income older people, as long as this does not lead to car dependency. Identified sites would need to be well-located to planned or existing infrastructure and services.

The Cottage Homes recognises the current record low rental vacancy rates would best be remedied by the creation of additional rental stock. Therefore, we strongly urge the Greater Adelaide Regional Plan to focus its attention on new approaches that facilitate higher stock levels, via increased density or occupancy on established sites through redevelopment, or via the construction of new stock on vacant or underutilised land.

Kind regards

[redacted]

Ben Sarre, Executive Officer
On behalf of the Board of The Cottage Homes Inc.

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 4:21 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: Greater-Adelaide-Regional-Plan-Submission.docx

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Other
Given name:	Shannon
Family name:	Evenden
Organisation:	The Environment Institute at the University of Adelaide
Email address:	[redacted]
Phone number:	[redacted]
Comments:	This submission is on behalf of a collaboration between the Healthy Environments and Lives (HEAL) Network, Environment Institute at the University of Adelaide, Dynamic State and UN Youth South Australia. Workshop discussions were strongly aligned wth the Commissioner's "Living Locally" ambition, with recognition that this aim requires the provision of all services including recreation, health, and greenspace in the immediate locality of new residential developments. Comments are detailed in document titled "Greater Adelaide Regional Plan Submission". They follow and represent discussions from a two-day workshop on Quality Urban Greenspaces with an interdisciplinary group of over 30 experts across academia, local and State government, and industry.
Attachment 1:	Greater-Adelaide-Regional-Plan-Submission.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 21.2 KB
Attachment 2:	No file uploaded
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

Greater Adelaide Regional Plan Submission

A collaboration of the Healthy Environments and Lives (HEAL) Network, Environment Institute at the University of Adelaide, Dynamic State and UN Youth South Australia.

Submission Background

This submission follows and represents discussions from a two-day workshop on Quality Urban Greenspaces held by the Healthy Environments and Lives (HEAL) Network, the Environment Institute at the University of Adelaide, and Dynamic State.

The workshops brought together an interdisciplinary group of over 30 experts across academia, local and State government, and industry. Areas of expertise included health and medical science, public health, architecture and urban design, environmental sciences.

Focus of this submission

The focus of this submission will be the provision of quality urban greenspaces, with "quality" defined in the workshops as "*vibrant, equitable, multifunctional and climate resilient urban greenspaces that supports human and ecosystem health*".

While workshop discussions were strongly aligned with the "greener, wilder, and more climate resilient environment" guiding outcome for Greater Adelaide's growth and the biodiversity priority, they also touch on processes such as greenfield and infill development, and priorities and outcomes such as social inequity and climate change. The breadth of relevance highlights the interconnectivity of urban greenspaces function.

This submission addresses areas as they were isolated within the GARP discussion paper; however, attempts to demonstrate the connection across areas.

Part 1 "How will Greater Adelaide grow", Outcome "A greener, wilder and climate resilient environment"

Discussion Q: What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment?

See below for detailed suggestions, based on discussions at the two-part Quality Urban Greenspaces workshop.

Trend/Driver: Climate impacts and biodiversity loss

What could the planning system do	Ideas for the GARP
Monitor and evaluate urban tree canopy coverage and distribution of quality urban greenspaces.	"**Continue to map the tree canopy to identify urban greening priorities and establish new targets that are annually benchmarked and reported on**" (pg. 55). Additional points to that described in the GARP Discussion paper discussed at the workshop include:

	● Overlaying tree canopy coverage mapping with elements such as socio-economic index and tree species diversity in order to develop a clearer picture of the current state and required action. ● The health benefits of access to greenspace, and challenges with inequitable distribution across socioeconomic demographics
	Report on the quality, function and availability of urban greenspaces across Greater Adelaide ● Evaluate current use of and need for new standardised tools and metrics to report on quality and use of urban greenspaces ● Encourage standardised measurement and reporting of urban greenspaces throughout Greater Adelaide
Improve, evaluate and/or modify standards and regulations regarding urban tree canopy.	**Improve Greater Adelaide-wide standards and regulations for tree establishment, management and removal** Recommended standards and regulations discussed during the workshops include: ● Minimum maturity for street trees in new and existing developments ● Management strategies with respect to overhead powerlines ● The protection of areas available for large trees to be planted on nature strips ● Species priority and species diversity (see below)
	Evaluate and modify standards and regulations to ensure resilience for future climates and reduce risk of biodiversity threats. ● The workshop discussions noted the increased risk to existing canopy with increasingly common, and lengthy drought events caused by climate change. It was suggested that a strict adherence to historically native species may not be optimal, and proactive planting of semi-arid species should be prioritised. ● Additionally, in order ro reduce the risk of biosecurity threats an increased diversity of trees should be planted within new developments.
Promote an urban environment that maximises the use of limited space	**Improve on the quality of existing greenspace and transport corridors** The workshop participants recognised a competition for landuse, and challenges of working within previously built environments that did not prioritise available public greenspace. As such, there is a need to harness and improve on existing greenspaces and transport corridors.

	● Repurposing extensive grass-dominated greenspaces to provide multi-functional benefits to human and ecosystem health
	Increase the creation of greenspace within otherwise unusable space. ● For example, planting on verges, edges of bikeways, and spaces between buildings

Trend/Driver: Changing mobility systems

A key limitation to the development of quality urban greenspaces and tree coverage discussed at the workshops was the space available in established infrastructure and in development projects.

A potential solution discussed is aligned with changing mobility systems through redefining streetscapes. Redefining streetscapes, both in residential streetscapes and metropolitan Adelaide, away from car-centric use and towards public and active transport opens up space otherwise used by cars for increased tree coverage and greenspace.

What could the planning system do	**Ideas for the GARP**
"**Promote an urban form that encourages greater use of active transport options, such as walking, cycling and public transport**" (pg. 54) and disencourage the use of cars.	**Facilitate active and public transport use in residential streetscapes and disencourage the use of cars** (aligned with Figure 2 of the Discussion Paper). Ideas included: ● Undertake analysis of changes in patterns of traffic and car-use where car capacity may be constricted, or alternative transit instituted. ● Increase access to public transport and active transport infrastructure throughout suburban and residential streetscapes ● Reduce suburban speed limit to 30km/hr. Workshop participants noted lower speed limits in conjunction with "shared streets" designation has increased pedestrian safety, changed design philosophies to accommodate alternative transport modes of transport (e.g., cycling, walking) and allows for greater planting on residential streets within current road-safety design policies. ● Redesign residential streetspaces, for example, reduce width of residential and suburban streets, and utilise extra space for trees and vegetation.

	This approach touches on numerous priorities and outcomes including improved overall public amenity in suburbs, social wellbeing, biodiversity and climate mitigation.
	Reduce the role and priority of cars within the Adelaide metropolitan area. ● Following in the footsteps of cities such as Amsterdam and London, and transitioning away from the use of cars within the CBD. ● By reducing the use of cars in the city, more space is opened up for built, social and green infrastructure.

Suggested Additional Trend/Driver: Community connection, capacity and engagement.

Complete communities are identified in the GARP Discussion Paper as a "Complementary approach" to climate change i.e., a "planning system [that] might promote urban greening which stores greenhouse gas emissions while also helping us to adapt by cooling our suburbs as average temperatures rise" (pg. 42). However, there are no specific planning systems or ideas to build connection, capacity and engagement within community. Discussions during the workshops strongly suggest the need to create focus on community.

Additionally, any development plan should consult with community on wants and needs, and seek for community support. Therefore, it is suggested that the GARP dedicates a section to engaging with community.

What could the planning system do	**Ideas for the GARP**
Seek and address the wants and needs of the local community	**Consultation with local communities on what they want and need in terms of urban greenspaces** ● Discussions with youth (year 11 and year 12) at a UN Youth SA Summit about urban greenspaces highlighted an

	observation of inadequate multi-functionality of urban greenspaces. Many youth, particularly those from first or second generation international families, felt that the needs of their community and culture were not being met. Greater Adelaide is culturally diverse and, as such the development of urban greenspaces should accommodate for this diversity. ● With reduced access to private greenspaces from infill comes an increased need for quality public greenspaces. Workshop participants discussed the rising needs of local communities to access and utilise public greenspaces in a manner that meets their diverse wants and needs.
	Foster community connection through activation hubs, community centres and other shared spaces Discussions at the workshops acknowledge that the cost of consultation can be high. A great, resource-efficient method of engagement is through established community connections and centres. Further, fostering community connection supports health and wellbeing.
Develop and foster opportunities for community to become engaged with their immediate environment	**Develop and foster opportunities for community to become engaged with their immediate environment** ● Recognition of community and local-driven projects as a gold standard for developing and maintaining quality urban greenspaces

Part 2 “Where will Greater Adelaide grow”, Urban Infill Growth

Discussion Q: What do you see as the benefits and potential drawbacks of infill development?

Workshop discussions recognised that large-scale strategic infill sites are limited, and therefore the necessity of smaller-scale development to support Adelaide’s population growth.

However, workshop discussions identified “small-scale infill”, particularly subdivisions, as a development mode especially problematic for quality and functional urban greenspaces and tree canopy coverage.

To ensure a sustainable transformation of Adelaide’s existing, low-density built form, policy emphasis needs to be placed on encouraging planned medium-scale development, and discouraging traditional subdivisions.

Discussion Q: How can infill development achieve an urban form that is consistent with the principles of Living Locally?

Infill development can better achieve an urban form consistent with the principles of Living Locally,

specifically in regards to access to open and recreational space (not that it is recommended “greenspace is included), should include prioritisation of public greenspaces in Master Plans of urban infill development.

Discussion points from the workshops included:

- Smaller-scale medium density, if applied correctly can lead to an increase in public green space. The potential of medium density development remains largely untapped in Adelaide’s urban form.
- Create planning requirements to ensure adequate community green space through the process of densification.
- Developments designed with the assistance of experienced architects from early-stages achieved greater success in integrating effective natural environments.
- Improving on the current South Australian Urban Infill standards that are incompatible with the 2017 Greater Adelaide 30-Year Plan for a 20% increase in canopy coverage.

It was noted that smaller-scale medium density development, if carried out with greenspace in-mind, can be used in areas where larger-scale precinct developments are impractical. Workshop discussions commend medium-density developments as providing the greatest opportunity for reforming Adelaide’s built form to accommodate increased density, support the Commissioner’s ‘Living Locally’ goal, while providing opportunity to *increase,* not just maintain, public greenspace supporting the Commissioner’s “greener, wilder and more climate resilient” Outcome.

Part 2 “Where will Greater Adelaide grow”, Greenfield Development

Discussion Q: What do you see as the benefits and potential drawbacks of greenfield development?

Workshop discussions were largely not in favour of greenfield development; however, recognised it as part of the suite of options available for increasing housing supply.

Participants noted recent insufficient trends in greenfield development in Adelaide’s North, South and Hills in providing adequate community space, streetscape provisions conducive to the 2017 30-Year Plans urban canopy goals, and lack of consideration for transport modes more conducive to “Living Locally”, “a more social equitable place”, and “a greener, wilder, and more climate resilient future”.

Discussion Qs: How can greenfield development achieve an urban form that is consistent with the principles of Living Locally? *and* ***What is the ideal urban form to support the growth of satellite cities like Murray Bridge and Victor Harbor?***

- **Discourage development of traditional low-density greenfield developments.**
    - Workshop participants noted the large reduction in green space, whether native vegetation or farmland, as a result of low-density developments.
    - Ensure early development of community public space, and provision for future expansion of accessible recreation and socialisation spaces.

- **Retention, restoration and prioritisation of greenspaces in Greenfield areas for public use.**

    - Workshop discussions stress that Greenfield developments of the next 30 years needs to consider a change from historic philosophies of suburban, low-density developments that

prioritise the provision of private greenspace and account for trends of subdivision and accompanying reduction of private urban greenspaces.

- **Ensure greenfield developments feature a transprot infrastructure foundation resilient to future density.**
    - Transport-usage modelling to account for future densification; outer-suburban developments should anticipate densification.
    - Create accessible car-alternative transportation methods to key employment hubs (including the CBD); prevent the establishment of car-centric culture in greenfield developments.
    - Participants stressed that given the highly limited availability of land, planning policy and development *must* proactively integrate greenspace and transport infrastructure; further identifying that certain modes of transport (cars/roads) are less conducive to greenspace integration than other modes of transport (public rail, active transport).

APPENDIX

Workshop Outcomes

Below the barriers and challenges discussed during the workshop are described and grouped.

Drivers

- **Competing Landuse Interests and Planning**
    - Limited resources in urban planning and development e.g., space, funding, time
    - Population growth and urban infill
    - Conflict with a growth model
- **Physical barriers**
    - Historical and traditional prioritisation of grey infrastructure over living infrastructure
- **Restricted Enabling Conditions**
    - Limited capacity and expertise within local, state and federal government
    - Weak laws and restricted regulations
    - Low community awareness, ecological literacy and engagement
    - Bureaucratic challenges to effective collaboration

Consequences

- **Ineffective collaboration**
    - Late or inflexible inclusion of greenspace design into development plans
    - Insufficient unified language on the purpose and multifunctional benefits of greenspace
- **Low capacity and incentive to develop and maintain quality urban greenspaces**
    - Priotisation of maintenance and asset management

    - Low diversity of offering and overrepresentation of the same urban greenspace functions e.g., playgrounds and sports fields
    - Low street tree species diversity
    - Removal of street trees
    - Low consultation and response to the demographic diversity of the community
- **Low community demand for maintenance and development of quality urban greenspace**
    - Insufficient pressure on local, state and federal government
    - Expectation for all “empty” space to be developed
    - Removal of street trees
- **Low prioritisation of resources (space, time and funding) to quality urban greenspaces**
    - Design of quality urban greenspaced can be limited by a need to reduce extent of required the maintenance
- **Implementation gap between policy, strategy and outcome.**

DTI:PlanSA Submissions

From: The North Adelaide Society Inc. <northadelaidesociety@gmail.com>
Sent: Monday, 6 November 2023 4:59 PM
To: DTI:PlanSA Submissions
Cc: awleviston
Subject: Submission – Greater Adelaide Regional Plan – Discussion Paper – 30 Year Plan
Attachments: 20231106-TNAS-Submission-PlanSA-SAPC-GARP-DiscussPaper-lodged.pdf

You don't often get email from northadelaidesociety@gmail.com. Learn why this is important

Mr Craig Holden
Chairperson, State Planning Commission
c/- Plan SA - Department for Trade and Investment
By email only: plansasubmissions@sa.gov.au

6 November 2023

Dear Mr Holden

Submission – Greater Adelaide Regional Plan – Discussion Paper – 30 Year Plan

Please accept the attached as the submission of The North Adelaide Society Inc. concerning the Discussion Paper addressing the above matter.

Thank you in anticipation of your consideration of our submission.

Please acknowledge receipt.

Yours sincerely,
The North Adelaide Society Inc. (est. 1970)

THE NORTH ADELAIDE SOCIETY Inc.
POST OFFICE BOX 60, NORTH ADELAIDE, SOUTH AUSTRALIA 5006

email is the preferred mode of correspondence
northadelaidesociety@gmail.com [**NFP**]

Mr Craig Holden
Chairperson, State Planning Commission
c/- Plan SA - Department for Trade and Investment
By email only: plansasubmissions@sa.gov.au

6 November 2023

Dear Mr Holden

Submission – Greater Adelaide Regional Plan – Discussion Paper – 30 Year Plan

Please accept this letter and ***attachment*** as the submission of The North Adelaide Society Inc. (TNAS) (membership: >200) concerning the Discussion Paper addressing the above matter. Please also accept our appreciation for your time and contribution to our Workshop discussions which has informed this submission.

TNAS hopes that the State Planning Commission (SPC) will:

1. step into the shoes and lives of local people and communities in considering the issues to which your Discussion Paper refers;
2. steer away from repeating the errors of the past resulting in an ongoing outward 'Americanised' urban sprawl, which continues to eat into areas of food production; and diminution of local, historical, and heritage character;
3. instead steer towards land use that will enhance and create local character and local communities, workplaces and industry within green spaces, much as Colonel William Light fought to achieve for the City of Adelaide; and
4. respect that the best development and land use is not one necessarily sought by a 'planning and development industry' but is best sought by respecting the wellbeing and health people and communities, and conserving what makes Adelaide and Greater Adelaide different, namely its historical approach for 'humanistic' and 'human scale' effective land use that enhances people living and working locally and regionally.

Thank you in anticipation of your consideration of our submission.

Please acknowledge receipt.

Yours sincerely,
The North Adelaide Society Inc. (est. 1970)

PlanSA State Planning Commission

Re: Greater Adelaide Regional Plan (GARP) – Discussion Paper

SUBMISSION:

Made by:

The North Adelaide Society Inc. (est. 1970) (TNAS)

TNAS has a large and diverse residential and business membership. It has a long and productive history of community engagement in, and contribution to, matters concerning planning and development, park lands and 'green spaces', character and heritage, residential, business, and transportation land uses; and environmental issues impacting neighbourhoods, local communities and Adelaide as a Capital City within the Greater Adelaide Region.

Per email only

plansasubmissions@sa.gov.au

About 30 year planning for Greater Adelaide:

"How should Greater Adelaide grow?"
What should be the "outcomes for Greater Adelaide?"
What "outcomes the State Planning Commission should consider?"
"Living locally … What neighbourhood features enhance living and working locally?"

INTRODUCTION

1. The Discussion Paper:
   1.1. Concerns the issue of land availability and land use envisage during the next 30 years.
   1.2. Appears primarily concerned land use and availability in the middle and outer areas of Greater Adelaide.
   1.3. Makes many assumptions, including rates of population increase that considerably exceed past rates of increase.[1]
   1.4. Addresses a wide range of matters in which TNAS and its members have an interest. However, the breadth of matters is beyond the capacity of TNAS to address in detail and the questions pondered by the Discussion Paper will be addressed '*en bloc*'.
2. TNAS has conducted a Workshop that has informed this submission.[2]
3. TNAS hopes that the State Planning Commission (SPC) will:
   3.1. step into the shoes and lives of local people and communities in considering the issues to which the Discussion Paper refers;
   3.2. steer away from repeating the errors of the past resulting in an ongoing outward 'Americanised' urban sprawl, which continues to eat into areas of food production; and diminution of local, historical, and heritage character;

[1] This submission does not address the appropriateness of assumptions made in the Discussion Paper, both generally and in respect of population increase in the City of Adelaide. This submission does note that past 30-year plans have made assumptions that have not come to fruition, such is the nature of assumptions and presumptions; and the population increase presumed for the City of Adelaide ought to note that to a significant extent the increase over the last decade or so has been the product of significant increases in temporary student accommodation, as opposed to ongoing stable and consistently occupied dwellings.
[2] Note: The content of footnotes are 'part and parcel' of this submission and is not the lesser for being included in a footnote.

3.3. instead steer towards land use that will enhance and create local character and local communities, workplaces and industry within green spaces, much as Colonel William Light fought to achieve for the City of Adelaide; and

3.4. respect that the best development and land use is not one necessarily sought by or in the interests of a 'planning and development industry' but is best sought by respecting the wellbeing and health[3] of people and communities; conserving what makes Adelaide and Greater Adelaide different, namely its historical approach for 'humanistic' and 'human scale'[4] effective land use that enhances people living and working locally and regionally.

CONSIDERATION

4. The availability of land for uses may be a product of the best appropriate use having regard to the natural or human-altered elements of the land and its environment.

4.1. That may be measured against contemporary societal spatial needs and western monetarised values.

4.2. Perhaps more importantly, it ought to be measured as against the impact of the possible uses on the land and its environment; and the human and environmental opportunity costs (immediate or inter-generational), including the loss of or impact on food and rural productive purposes and the loss of retained natural environment and ecology for the future.

5. **TNAS considers** that:

5.1. Urban planning is the process of designing, developing, and supporting urban areas to meet the contemporary and especially the reasonably expected future needs and wellbeing of the applicable community; and

5.2. Local communities (people and liveability) should be at the heart of planning, foremost in the mind of policy and decision-makers; and entitled to actively engage in the both the policy and practical processes of planning decisions with accessible equitable rights no less than apply to applicants, developers, and planning authorities. To do otherwise is to perpetuate an imbalanced and inequitable planning system and resultant contemporary and inter-generational outcomes.

6. **TNAS welcomes**:

6.1. The apparent recognition of the value of and support for retaining, enhancing and expanding characteristic, historical and heritage neighbourhoods, precincts and localities (i.e., 'character zones') and the value to the future of historic, cultural[5] and heritage built form. However, such zones and values apply equally to many towns or localities within the state and parts of the Greater Adelaide Region, and ought to no less be recognized as such;

6.2. Focus on 'local living' and local amenity, much as can be seen to occur in parts of the City of Adelaide and to a lesser extent the inner metropolitan area;[6]

[3] In this submission, a reference to "wellbeing and health" or "wellbeing" is intended to include contemporary and reasonably foreseeable environmental, social, economic, societal, and general health matters.
[4] '*humanistic urban environment*', Jan Gehl
[5] The cultural value of built form is an element of the historic fabric and the heritage of the built form. As a matter of policy, it is no less of value than built form fabric. That no less applies within the Greater Adelaide Region than it applies within the City of Adelaide and Metropolitan Adelaide. It is regrettable that a cultural value appears to have a lesser heritage value or 'performance' value than an altered built form in which it existed. A recent example is the approval by SCAP to demolish Adelaide's first charitable workshop and industry for blind people established by the Baptist Church alongside the Ebenezer Chapel. TNAS considers that that is an example of the void between policy and outcome; and exemplifies a need for a much stronger statement of policy in the GARP. Built form heritage is not only valuable for the varied appearance of historic build-stock but because it retains the history of how our community sees itself and tells the community story through its structures. A Plan without respect for culture and heritage does not makes Adelaide the lesser, not greater.
[6] This contrasts with the 'bigger is better' as one progressively moves away from the inner metropolitan area.

6.3. The inclusion of 'humanistic', 'human scale', and natural environmental considerations in the Discussion Paper and urges that that be foremost in mind in identifying land availability for future uses;

6.4. Absolute retention and protection of:

a) heritage and conservation zones and localities, and nonetheless urges further strengthening and improved processes;

b) small and broad-acre farming and food production land use (and preferably implementation of policies to support their enhancement and 'food security' values; and prohibition of inconsistent land use; incremental erosion of such land use; and that unrelated non-rural land use be confined to within township boundaries).

7. **TNAS urges**:

7.1. Adoption of land use policies and outcomes that apply **express quantitative criteria** (e.g., height, density, mass, scale, energy use, solar orientation, public green and wellbeing spaces, mobility) to achieve efficient and effective contemporary and future outcomes.

a) This can include minimum heights in appropriate circumstances or localities.

b) It is incongruous and perhaps somewhat perverse that a new residential development may include only one or two storeys/levels when the location or site can reasonably support three or four storeys/levels, simply because two storeys/levels may not require public notification, or may not be convenient to the applicant/developer.

c) It may also be incongruous that heritage built form may become increasingly degraded because re-use or renovation is constrained by current building requirements.[7]

7.2. Land use and attendant infrastructure being subjected to a greater focus on **measurable performance based outcomes** (i.e., based on quantitative criteria rather than subjective assessment or uncertain policy notions).[8]

This would include, for example:

a) Retaining and increasing trees, understorey, and biodiversity (including in the public realm and governmental development/infrastructure), and decreasing environmental degradation;

b) Transport options and car-based alternatives such as trains and light/rapid rail, integrated rail/road transit, rapid mass transport hubs, 'last mile' and local-mobility options such as small-wheeled (non-ICE[9]) modes; and walkability, shade,[10] and safety;[11]

c) Medium rise/density <u>with</u> surrounding green/wellbeing spaces and internal natural light and airspaces, including ground floor neighbourhood based local businesses and services. This would be more in the style of European or Continental village or local living hubs within green/wellbeing spaces and having mixed/diverse residential (and demographic/socio-economic) choices[12] and supporting business services, facilities, and

[7] This issue ought to be capable of being addressed by appropriate policy that is capable of being individually and pragmatically applied to a particular heritage listed built form.
[8] TNAS notes the submission lodged by "Community Alliance SA" (5/11/2023) and is generally supportive of many of the suggestions and recommendations therein.
[9] ICE means: internal combustion engine.
[10] The loss of street corner shade is most obvious within the City of Adelaide and wherever pedestrians are required to stand awaiting a change of lights. There was a period in which awnings and verandas were encouraged to be removed supposedly to allow views of buildings, with no regard to pedestrian comfort in the Capital City of the driest state on the driest continent; most bizarre.
[11] TNAS notes the submission lodged by the "Transport Action Network" (3/11/2023) and is generally supportive of many of the suggestions and recommendations therein.
[12] A demographic mix (single, couple, family, younger, older, private, social, co-op, socio-economic) ought generally to be a feature whether within a city, town, village, suburb, or precinct. A mix of dwelling creativity and styles will support diversity of communities. A mix of types of ownership, long-leasehold, and tenancies will enable diversity and mix of opportunities (residential and business).

amenities[13] on local 'high streets', as opposed to ongoing single level sprawl requiring car based travel to work, services, and facilities;[14]

d) Rainwater storage; grey water re-use; solar panels; low scale wind turbines;

e) Solar and environmental orientation (i.e., energy efficiency design and orientation) rather than priority for street facing presentation;[15]

f) Express levels/mix of required "affordable" dwellings[16] rather than the current 'incentive' based uplift of medium and high rise development;

g) Deleting 'catalyst sites', and alternatively confine them to 'master-planned'[17] greenfield locations (e.g., land releases) and rehabilitation or re-use of previously large scale industrial precincts (e.g., previous Clipsal industrial precinct; previous Gas works precinct; previous Brewery precinct);

h) Considering renewal options for locations where small dwellings occupy disproportionately large sites; or for minimum quantitative requirements for appropriate future development (built form and green/wellbeing space); and

i) That open space is reserved for open space and that the obligation for open space cannot be cheaply 'bought out' by instead contributing to an open space fund that may not be used for 'open space'. In medium density or medium rise developments, green open space ought not be capable of being 'bought out', which only exacerbates 'heat-sink cities'. Pocket parks have long been a feature of developments as long ago a Victorian London and European cities and ought to be reconsidered and reapplied in contemporary developments.

8. TNAS notes that it may have been helpful if the report of the Expert Panel had been released by the Minister contemporaneously with this Discussion Paper and notes that there is a state infrastructure paper that has also recently been released for public consultation that presumably will have a bearing on this Discussion Paper.

9. Thank you for the opportunity to make a submission.

The North Adelaide Society Inc. *(est. 1970)*
6 November 2023

–oOo–

[13] Business services, facilities and amenities is intended to include ICT, health, medical, and government/public services conducive to the amenity and needs of the precinct. There are many Continental urban examples of business/ shops on the ground floor with living on upper (2-4) levels that seem to work well and could be emulated within the Greater Adelaide Region and especially new large scale urban developments.

[14] There are many localities that partly emulate aspects of this European or Continental 'style', albeit almost invariably without the benefit of surrounding or nearby green/wellbeing spaces. Most obvious are those within or adjacent to the long-ago planned City of Adelaide, which one might consider to be somewhat ironic.

[15] Regrettably, the planning and development industry often appear to insist or promote priority of 'cookie-cutter' design to the street, rather than design for a living (incl. energy efficient) environment.

[16] In this submission, "dwelling" is intended to reflect the whole range of residences in which people live.

[17] 'Master-planned' has become somewhat of an oxymoron. It would be preferable that it was not so and would instead demonstrate that planning and environmental creativity can arise to again make future liveability and effective land use a hallmark of planning and diversity of development for Adelaide and Greater Adelaide, as it was when planning land use and the green envelope (Adelaide Park Lands) for the City of Adelaide. It is not only the planning and development industry, and government coffers, that have an interest; that applies also to future generations that will have to bear the inter-generational cost of any short-sightedness.

DTI:PlanSA Submissions

From: Jennifer Bonham <transportactionnetwork@gmail.com>
Sent: Saturday, 4 November 2023 5:47 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: Transport Action Network Submision to the GARP discussion paper.pdf; Greater Adelaide Public Transport A Network for 21st Century Challenges.pdf

You don't often get email from transportactionnetwork@gmail.com. Learn why this is important

Dear Growth Management Team

Please find attached the Transport Action Network's Submission to the Greater Adelaide Regional Plan Discussion Paper. The Submission includes the associated Paper 'Greater Adelaide Public Transport: A Network for 21st Century Challenges.'

Best Regards
Jennifer Bonham PhD
[redacted]

Transport Action Network

Attention: Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
E: plansasubmissions@sa.gov.au

3 November 2023

Thank you for the opportunity to respond to the Greater Adelaide Regional Plan Discussion Paper.

The Transport Action Network (TAN) comprises community organisations, active and public transport advocacy groups, urban and transport planners, practitioners, and researchers concerned for the future of sustainable transport and land use integration in South Australia.

TAN participants have reviewed the GARP Discussion Paper through a transport/mobility lens. As part of our submission, we have attached TAN's Paper *Greater Adelaide Public Transport: A Network for 21st Century Challenges*. The Paper includes transport proposals related to the development of Greater Adelaide over the next thirty years.

Wendy Bell LFPIA
Jennifer Bonham PhD,
Donna Ferretti PhD, LFPIA
Joanna Wells
for the Transport Action Network
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Response to the Greater Adelaide Regional Plan Discussion Paper

1. Guiding Principles

1.1 Alignment

Alignment with the State Planning Policies and other government strategies and plans is one of the principles said to be guiding growth and change of Greater Adelaide over the next 30 years. Given this, it is difficult to understand why the GARP and the Infrastructure SA Discussion Papers differ on the population projections used in the different documents. The GARP uses high projections stating that the Greater Adelaide Region could grow by as much as 670,000 people by 2051 whereas Infrastructure SA uses medium projections stating that the entire South Australian population will only grow by 500,000 people by 2051. This is a serious misalignment and raises questions about how well coordinated State Government agencies are in the development of policy and strategy.

We recommend:

- alignment of the projections to be used in planning for Land Use, Infrastructure and Transport for the next 30 years, and
- the medium projections serve as the basis of the GARP as this would put the anticipated population increase of Greater Adelaide at 420,000 people (84% of the State's projected medium population increase) which aligns more closely with the State's population growth over the past 50 years.

1.2 Integration

TAN sees integration as a fundamental principal of the GARP having called for an Integrated Transport and Land Use Plan in its 2022 position paper 'Creating Transport Choices.' We are concerned that the focus in the GARP discussion paper is on aligning future residential and employment development with motorways and arterial roads. This direction will further entrench car use, undermine the *living locally* objectives of the GARP (see Section 4.2) and thwart attempts to reap the individual, social and environmental gains generated by increased public transport patronage.

Further, growth in freight and passenger vehicles competing for road space will increase congestion and undermine productivity (see Section 4). Transport planners understand we cannot build our way out of congestion given the significant costs and relatively short-term benefits of road projects. It is imperative that the land uses, urban form, and infrastructure pursued in the GARP maximises:

- inclusive active transport connectivity between housing and local services and facilities,
- cycling and micro-mobility networks across suburbs, and

- the potential of public transport to move people across the Greater Adelaide region.

We recommend:

- significant strengthening of land use, inclusive active transport, and public transport integration within the GARP via a specific Integrated Transport Outcome informed by an explicit objective to improve existing and provide future infrastructure (see Section 2),
- strengthening land use and inclusive active and public transport integration in the State Planning Policies,
- ensuring strong land use and inclusive active and public transport integration policies are embedded in the Planning and Design Code,
- embedding, formalising, and extending the mass transit corridors, and mass transit investigation areas, in the GARP, and
- the inclusion of an implementation plan with clear and tangible actions, coordination with the appropriate agencies, and a 6 monthly reporting mechanism that ensures the implementation plan is being delivered for the purposes of transparency and accountability.

Finally, it is difficult to see how the principles set out on page 19 align with the principles on page 101.

We recommend:

- Clearly aligning the principles used to guide the GARP's scope and preparation with the principles for identifying Land for Housing and Jobs.

2. Proposed Outcomes

The GARP seeks to achieve four commendable outcomes over the life of the plan (pp. 36-80)

- A **greener**, wilder and climate resilient environment.
- A more **equitable** and socially - cohesive place.
- A **strong economy** built on a smarter, cleaner, regenerative future.
- A greater choice of **housing** in the right places.

TAN's response to the question on page 37 '*What do you think of the four outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider*?' is as follows.

As indicated above, a key missing outcome is that of equitable and sustainable transport. References are made throughout the document to facilitating and promoting the use of public and active transport by locating housing within easy access of public transport routes and integrating housing with other land uses, *living locally,* to reduce car use and foster active modes.

> ‘Living locally aims to create connected, convenient, cohesive, and climate-smart communities, and to reduce the need for long-distance car travel, with an emphasis on physically active travel.’ (p84)

Living locally concepts have guided planning professionals and advocates for almost 100 years. Planners have also recognised that not all needs can be provided for locally and public transport is vital to ensure all citizens can access opportunities (health, education, employment, entertainment etc.) beyond their immediate area.

The GARP acknowledges that residents will continue to travel outside their local areas for employment and education opportunities yet it proposes locating new housing estates in areas that will not be served by public transport. This position is untenable. It compromises affordable living as households become locked into multiple car ownership and it creates transport disadvantage for those without a driver’s licence, those with a licence but unable to drive such as infirm elderly, and those who cannot afford to own, maintain, and operate a vehicle. These groups together are likely to make up approximately 50% of the population. Further, suggesting that new development should locate in areas with existing mass transport links does not reflect the existing under-provision of public and inclusive active transport infrastructure.

Addressing the ambition to increase inclusive active and public transport requires an associated Outcome.

This Outcome should be accompanied by appropriate integrated land use and transport directions with practical and implementable solutions that acknowledge and respond to SPP11 – Strategic Transport Infrastructure which it is currently silent on.

The inclusion of transport related objectives is well within the remit of a planning strategy:

- Victoria - *Plan Melbourne* – Outcome 3 - an integrated transport system that connects people to jobs and services and goods to market
- NSW - *Central City District Plan* – Direction 6 – A well connected city
- WA – *State Planning Strategy 2050* - Direction 2.1 - To manage the movement of people, goods and services through an integrated network connected locally, regionally, nationally, and globally.

We recommend adding the following Outcome.

- An equitable, environmentally sustainable **transport** network that facilitates inclusive, independent access.

3. Residential growth through a transport/mobility lens

3.1 City of Adelaide

The GARP Discussion Paper anticipates the CBD will continue to be a major centre for businesses, employment, and tourism. It is also forecasting a doubling of the City's population.

Population and employment growth will rely on creating and maintaining an attractive, liveable City Centre especially in the face of a warming climate. While the City of Adelaide is creating a City Plan to accommodate growth, it is incumbent on the GARP to acknowledge the role of State Government in supporting that plan. It will be essential to provide a high-quality mass transit network that allows employees and visitors to easily access business, retail, entertainment and cultural precincts in the City. This network will also allow residents and tourists to move easily around the City and visit places beyond it including beaches, regional towns, conservation and national parks, and wine growing centres.

Metropolitan and City of Adelaide strategies and plans have identified the need to link the northern and southern rail lines to improve the efficiency of the rail network.[i] Infrastructure SA also identified the need to investigate this link in its 2020 Plan.[ii] As we note in the attached paper, establishing that link via an underground CBD loop would improve access within and beyond the City of Adelaide (see Section 4). Reducing the need to use a private car to access the City Centre will improve air quality, reduce noise, allow a transition in street space to increase land available for greening and social interaction, and provide space for safe and convenient walking, cycling, and wheeling.

We recommend:

- including in the GARP an underground CBD loop that links the northern and southern rail lines (see also Section 4).

3.2 Urban Infill

TAN agrees that *strategic infill* is an important approach to increasing housing and that it should be located immediately adjacent existing public transport interchanges and judiciously selected light/heavy rail stops and stations. We also agree that strategic infill needs to be master planned to ensure the timely provision of services and facilities and access by well connected, inclusive, safe, and direct active transport networks.

Urban Corridor development is another obvious measure to increase the amount and diversity of housing within inner and middle suburbs. However, it should only proceed where high frequency, mass transit services have been established (or are in the active planning stages) and operate on their own right of way as much as practicable (e.g., on dedicated bus or high occupancy vehicle lanes at least in peak times). Reducing private motor vehicle traffic and prioritising the use of non-polluting buses (electric or green hydrogen powered) are essential to reduce pollution and ensure liveability and the health of residents along these Corridors.

Poorly located *general infill,* such as replacing single dwellings with 2 or more dwellings, is likely to exacerbate existing infill development issues including: increased local area traffic, intensified demand for parking, loss of greening and habitat, loss of tree canopy, increased urban heat, increased impermeable surfaces, increased volume and rate of stormwater runoff. The *greyfield* residential precinct planning trialled in the City of Maroondah and incorporated into the City's development plan can address these issues.[iii] Identifying *greyfield* sites in inner and middle suburbs adjacent to public transport, and facilitating land assemblage by neighbouring home owners can facilitate increased housing with better design, more greening and reduced environmental impact.

Adelaide residents generally accept the need for infill and the fact that urban landscapes change. They are largely concerned with the overdevelopment of sites, poor design of infill, and failure to protect or enhance green infrastructure on individual sites.

We recommend:

- for *strategic infill* development,
    - working with inner and middle ring councils to identify more strategic infill sites in the GARP, particularly for affordable housing,
    - ensuring sites included in the GARP are located adjacent to existing public transport hubs and master planned to ensure walkable/cyclable neighbourhoods with safe, inclusive, and direct connections to public transport and local services and facilities, and
- for *urban corridor* development
    - include in the GARP areas with existing or planned high quality mass transit services,
    - work with the Department for Infrastructure and Transport to ensure corridors identified in the GARP are targeted for measures to significantly reduce the need for and use of private motor vehicles, including freight vehicles, and
- investigate *greyfield* precinct planning for inclusion in the GARP.

3.3 Outer suburban, peri-urban and township growth

A multiplicity of sites has been identified for development from Concordia, Riverlea, Two Wells and Dry Creek to Mount Barker, Sellicks Beach, Murray Bridge and Victor Harbor/Goolwa. The housing will be so widely dispersed across the Greater Adelaide region that newly developed areas will not reach the threshold populations required to support the local services and facilities that make it possible to *live locally*, reduce the need for car travel, and enable inclusive active transport.

Land release at Dry Creek is worrying especially given the warning (p103) to avoid growth in hazardous areas. Dry Creek is within sight of the Adelaide CBD but it will be inaccessible for anyone who does not have access to a car. The land is flood prone, it will be difficult and costly (if even possible) to remediate to support the level of greening required to reduce

urban heat in a warming climate, and it is bounded by major roads with no direct, safe, easy walking and cycling access to public transport.

We recommend:

- reducing the number of areas proposed for new growth,
- concentrating new growth in and around established townships such as Two Wells and Murray Bridge,
- master planning all new growth areas to ensure:
    - housing has safe, inclusive, direct, active transport routes to existing town centres and local services and facilities,
    - location of new services and facilities are identified and established with early occupancy,
- ensuring high quality public transport to new developments with services operating from early occupancy, and
- not proceeding with any development at Dry Creek.

Housing Affordability and Living Affordably

We are pleased the Discussion Paper sets out the differences between housing affordability and living affordably (p97). The costs to government, households, and community of locating people in different areas have been well researched.[iv] The NSW productivity commission included public transport provision in their calculations and put the average cost of outer metro development at $75,000 more per house than for inner metropolitan developments.[v]

The GARP Discussion Paper acknowledges the vulnerability of outer suburban car-dependent households to rising petrol prices but there are personal health, household and community costs that are generally not captured in research that compares location costs. These include *mobility of care* journeys[vi] such as 'serve passenger' journeys (e.g., taking children to school and elderly parents to medical appointments). According to recent Australian research, serve passenger journeys are still largely made by women.[vii] These costs are amplified when there is a lack of transport options including public and inclusive active transport, walking, cycling, micro-mobility, and shared mobility.

We recommend:

- analysing, or at least acknowledging, the broader range of costs associated with living in different locations.

3.4 Innovation in housing location

The discussion paper refers to locating new, diverse, multi-unit housing adjacent to major centres. TAN suggests a more innovative approach. For example, car parking areas at major Centres such as Noarlunga, Tea Tree Gully, Marion, Ingle Farm, Arndale among others

present opportunities for Public Private Partnerships that provide housing at the doorstep of these facilities.[viii] This could involve undergrounding a portion of existing car parking and providing diverse, multi-unit housing within a green, walkable setting connected to centre facilities.

We recommend:

- GARP include investigating public private partnerships at major shopping centres to co-locate housing and walkable neighbourhoods on a portion of existing car parks.

3.5 Housing/employment nexus

Local employment. As noted, the 'living locally' concept acknowledges there will be limited local employment. It is unclear how 'co-working' spaces and 'working from home' will develop into the future. These latter changes are likely to see an increased use of local areas for exercise and social interaction. It is vitally important that new and existing neighbourhoods are made walkable with inclusive active transport access to local parks, community, and retail/hospitality services. Local governments will need financial assistance and enhanced expertise to adapt local environments to changing workplace locations.

We recommend:

- including co-working spaces as a feature of the changing employment landscape and identified in master planning of new developments,
- acknowledging the additional resources and expertise local governments will require to adapt local environments to changing workplace locations, and
- including a target to work with DIT to reduce the default speed limit in local streets to 30km/h to facilitate local and connection trips by walking and cycling.

Industrial/employment growth areas. The Discussion paper recommends locating housing close to employment growth areas. In some cases, land near these sites is inappropriate for housing because of the nature of the land (e.g., flood prone) or the nature of the industry (e.g., potential pollutants). Further, people's housing and employment decisions may not closely align.

The paper is silent on how cross metropolitan, and intra- and inter-regional transport needs of employees will be met. It appears that the road network is expected to address both freight and personal transport demands for the next 30 years. As noted in Section 1.2 this will ultimately undermine the efficiency of both passenger and freight movements. Relying on private transport for the work commute impacts the liveability of neighbourhoods that abut major arterial roads and motorways – whether with noise or air pollution, neighbourhood severance, or cross suburban access. These impacts are already keenly felt in

the inner and middle suburbs, outer suburban centres such as Salisbury, Elizabeth and Noarlunga, and townships such as Mt Barker and Gawler.

We recommend:

- identifying public transport routes that facilitate fast, efficient access into employment hubs.

4. Sustainable Transport

The Discussion Paper acknowledges that the transport sector is responsible for 29% of GHG emissions and notes the role of active and public transport in reducing these emissions (pp48-49). Australia's transport sector GHG emissions are forecast to rise over the next decade before they begin to fall sometime in the mid to late 2030s.[ix] Electric vehicles will help reduce operational transport sector GHG emissions in the latter part of this Century but they will not a 'silver bullet.' If Greater Adelaide is to reduce transport related GHG emissions, improve personal and environmental health, ensure equity, and secure the liveability, productivity, and prosperity of the Region, the GARP will need to re-focus attention away from motorways/arterial roads (p94) and toward mass transit.

TAN welcomes the Mass Transit routes to Two Wells, Murray Bridge – Mt Barker/Nairn, and Sellicks Beach identified in the Discussion Paper. Similarly, the Mass Transit Investigation areas are significant. However, greater ambition is required in a Plan for the next 30 years. As part of our submission, we have attached TAN's Transport Choices and Public Transport Papers. The former outlines the need for a well-integrated Land Use and Transport Plan while the latter focuses on developing a public transport network for the Greater Adelaide Region including improvements to the bus and rail networks.

Perth, Brisbane, Sydney, and Melbourne have made and/or are making substantial investments in public transport infrastructure and services. These are the Capitals that have grown at a significantly greater rate than Adelaide (and Hobart) over the past 50 years.[x] It is worrying that despite tentative steps to include Mass Transit in the GARP Discussion Paper, the Infrastructure SA Discussion Paper does not envisage significant investments in public and active transport over the next 30 years.

Addressing climate change while ensuring a well-functioning, productive Region requires taking steps now to facilitate a shift away from rather than reproducing an unsustainable transport status quo.

We recommend:

- embedding mass transit corridors in the Greater Adelaide Regional Plan to service all proposed growth areas and facilitate interregional and interstate services,
- as per Section 3.1, identifying the need to link the northern and southern rail lines, preferably via an underground CBD loop, to transform the efficiency and attractiveness of the rail system, and
- identifying extensions of the tram/light rail system at least to North Adelaide-Prospect, and Adelaide Airport.

4.1 Trends in Transport/Mobility

The GARP acknowledges changes in transport/mobility that will gather pace over the next 30 years.

> Along with changes in how and where people will travel to and from work, autonomous vehicles and micro-mobility vehicles (e.g. e-bikes, e-scooters) will also influence daily travel patterns. Over the next 30 years the pace of change will increase as technology and digital connectivity increase electric and autonomous vehicle participation in the shared economy. The accessibility and affordability of this technology, and the facilitation of car and ride sharing could lead to demand shifts from public transport back to cars, which in turn might increase congestion (p68).

E-Bikes, e-Scooters and other Personal Mobility Devices are at the forefront of changes in how we travel. These vehicles have a role to play as feeder modes to public transport and they are also changing the terrains and distances people can travel without relying on a car. When people do need a car, share vehicles will play an increasing role. Adelaide is slowly following interstate trends with an increase in the availability and use of share vehicles. It is likely that cosmopolitan millennials,[xi] interstate visitors and environmentally conscious householders will push the share vehicle trend as part of a shift to mixed- or multi-modality.

Mixed modes or multi-modality (i.e., people using a variety of modes across a given time-period) have long been a feature of transport. However, the focus on single modes in our data collection has made active and micro-modes (e.g., skateboarding) largely invisible. Research into Mobility as a Service has helped direct attention to multi-modality and this needs to be understood in the South Australian context while planning our future urban form.

Despite acknowledging changing transport/mobility practices, the GARP remains silent on what the various trends mean for land use planning and State Planning Policies.

We recommend:

- providing deeper insight into the trends and potential of eBikes, micro-mobility, and share vehicles, and
- identify how these modes will be integrated into land use and infrastructure policies and planning to ensure their potential is realised in reducing GHG emissions and improving equity of access.

Autonomous Vehicles. The implications of fully Autonomous Vehicles (AVs) for the movement of people in urban environments remain largely unknown. Ongoing concerns relate to the regulation of vehicles, the role of and issues in using Artificial Intelligence in AVs, public acceptance, interactions in complex environments, impacts on public health, increased congestion, and higher demand for and cost of associated infrastructure.[xii] AVs will not replace the need for public transport but autonomous buses and trains are likely to play a significant role in the provision of public transport.[xiii]

We recommend:

- greater elaboration of the potential role, limitations and impacts of AVs on Greater Adelaide.

4.2 Transport and *Living Locally*

As noted above, we agree that well designed and systematically implemented *living locally* plans can facilitate greater use of low carbon and no-carbon modes. The *living locally* concept echoes objectives of the 30 Year Plan and should be readily achieved in master planned communities. However, the public and active transport targets of the 30 Year Plan were, respectively, exceedingly low and never on track to be met. This failure indicates the disconnect between the existing State Planning Policies that are aligned with the *living locally* concept and the implementation of these policies via Development Plans and, more recently, the Planning and Design Code (PDC). Success of the *living locally* concept in terms of accessing everyday needs via active transport will rely on Land Use and Transport Integration Policies being strongly embedded in the Performance Outcomes of the PDC coupled with high quality master planning and stringent compliance.

It is difficult to see how the *living locally* concept aligns with the 'motorway/arterial road' plans for housing and employment growth (p94). When people rely on private vehicles to access activities outside the local area, they will need to drive through their local area to reach the motorways/arterial roads. They are also likely to use their vehicles to access local services as they trip chain 'on the way to/from home.' This will have significant local impacts, such as giving over land to car parking and prioritising car movements on local roads, which will undermine walkability and walking as key objectives of *living locally*.

A *living locally* strategy will need to integrate services and facilities into public transport stations and interchanges. Co-location encourages people to access services and facilities 'on their way to/from public transport.' It allows the local areas to be produced as attractive, walkable public spaces.

We recommend:

- embedding *living locally* policy objectives in the Planning and Design Code Performance Outcomes,
- embedding master planning of all new housing estate developments into the Planning and Design Code Performance Outcomes,
- state funding for local governments to significantly increase their role in development compliance,
- working with local governments to identify public transport interchanges and key stop/stations to apply the *living locally* concept in established areas, and
- introducing targets and other incentives to ensure public and active transport improvements are solidly on the agenda.

Implementing Living Locally: Master Planned Growth

Setting minimum housing and/or population densities (p91) fetishises density as the key determinant of active and public transport use. It is noteworthy that the outer suburbs of the City of Ghent, Belgium has similar population, housing, and service densities to the inner suburbs of the City of Unley and yet for the journey-to-work Ghent's outer suburbs have three times the public transport use, four times the level of cycling and double the amount of walking.[xiv] It is clear densities are one factor influencing active and public transport use. However, as Paul Mees has argued, focusing on density has also allowed transport and urban planners to dismiss investments in public transport.[xv] Failing to invest in public transport entrenches private motor vehicle ownership, multi-car households and transport disadvantage. Failing to provide public transport on the simple measure of density ignores the important role that other measures play in supporting mass transit including: the overall extent and quality of the public transport network, attractive, inclusive, safe, and direct walking and cycling environments connected to public transport routes, feeder modes such as eBikes, micro-mobility and buses to public transport hubs, cultural representations, and life course experiences of different modes.[xvi]

Understanding density as but one factor in public transport use, will help reverse the hesitancy of South Australian policy makers in delivering active and public transport infrastructure improvements. Quality active and public transport networks are being delivered in towns and cities of similar density throughout the world. The recent Benchmarking Adelaide report found that Adelaide ranked last amongst its peers for the quality of its bike network and overall.[xvii] Adelaide was also the only peer city where the number of hours lost to congestion has increased since 2019.

We recommend:

- removing housing/population densities as a determinant of public transport provision, and
- the GARP identify the need to make walking the *easiest*, rather than simply an *easier*, mode in meeting inclusive active transport goals of living locally.

4.3 Transport, Regional Centres and Service Hubs

The GARP Discussion Paper does not address the role of existing regional centres (e.g., at Tea Tree Gully, Elizabeth, Salisbury, Noarlunga, Marion) and regional service hubs (e.g., Hospitals, University Campuses, Human Services Clusters) in the future of the Greater Adelaide Region. It does not address the relationship between proposed population growth areas, existing regional centres/service hubs and access between them. These regional centres and service hubs can be the nodes in a regional network connected by high quality public transport.

We recommend:

- identifying the relationship between regional centres/services hubs and proposed growth areas and access between these locations, and

- embedding mass transit improvements in the Greater Adelaide Regional Plan that help create a network of centres/services hubs and significantly improve connectivity between these locations, and
- generate innovative housing solutions to increase population within close-proximity to regional centres/services hubs.

5. Targets and Data

Transport is a fundamental dimension of each of the proposed GARP outcomes and we recommend, as per Section2, adding a Transport specific Outcome to ensure inclusive active and public transport are addressed. If the *living locally* concept is to be realised, it will require targets and ongoing data collection. Targets and associated data collection and reporting will help ensure local services and facilities are established in a timely manner.

Targets and associated data collection and reporting will need to be set for both infrastructure development and use of active and public transport. This should include:

- expansion of walking and cycling infrastructure in established and new areas,
- extent of road network with footpaths on both sides of the street,
- levels of service of walking and cycling infrastructure,
- expansion of the public transport network,
- upgrade of stations and station precincts,
- annual rates of walking, cycling, micro-mobility, and public transport use, (beyond journey to work),
- increase in public transport services,
- public transport data collection that identifies where people board and alight to better understand how the network is used,
- improvements to walking and cycling connectivity (zebra and wombat crossings installed, upgrade of intersection and mid-block crossing points to improve safety for active travellers),
- reduction in private motor vehicle kilometres travelled and corresponding savings in carbon emissions.

Existing local and state government data collection and reporting mechanisms should be able to capture the expansion of walking and cycling infrastructure, and the level of service of walking and cycling infrastructure.

State government data collection and reporting mechanisms can capture expansion of public transport infrastructure and services. Additional data collection methods will be required to capture the stops and stations that people board and alight from vehicles.

A rolling household travel survey can provide base line travel data for use of active and public transport and capture changes in use to determine whether targets are being met.

6. In Summary

TAN supports the concept of living locally as set out in Sections 2 and 4.2 and advocated in the joint submission to the GARP Discussion Paper by the Active Living Coalition, Bike Adelaide, Bike SA, Walking SA, and the Heart Foundation. TAN recommends a much greater focus on and innovation in infill as per Sections 3.1, 3.2, and 3.4. Infill housing needs to be master planned with high quality site design, diversity of housing, high level of greening with greater on-site storm water management and infrastructure (including charging stations) for share vehicles, eBikes, eScooters and electric vehicles. Crucially, infill needs to be located adjacent to public transport and existing services and provide safe, direct, connected active transport access to destinations within and beyond the infill area.

Development in the outer suburbs and peri-urban areas should not be dispersed across new greenfield sites but should be master planned and concentrated around existing townships and sub-regional centres that have high levels of services and facilities. Any new development in outer suburbs, the peri-urban area, and townships must be accompanied by an expansion of quality public transport services.

The Greater Adelaide Regional Plan requires a much greater focus on integrating all future development with active and public transport. A sustainable transport outcome that addresses the needs of the entire population, as described in Section 2, should be included in the GARP Outcomes. This Outcome requires targets, base line data and ongoing data collection (as noted in Section 5) to track whether targets are being met. TAN supports the Urban and Transport Planning and Design Features set out in Figure 3 of the joint submission made by the Active Living Coalition et al.

It is also essential to identify targets for the other Outcomes identified in the GARP. For example, in meeting environmental and equity Outcomes a target can be determined for the proportion of new developments with *Green Star – Communities* (or similar) ratings. TAN supports the elaboration and regularisation of active and public transport data collection and analysis identified in the joint submission made by the Active Living Coalition et al. The Department of Infrastructure and Transport should bear responsibility for collecting, analysing, and publicly reporting on transport for all modes and diverse journey types.

Related SPPs	What could the planning system do	Ideas for the GARP
SPP 1 – Integrated Planning	**Greener, wilder and climate resilient region** **GARP comment** • Promote an urban form that encourages greater use of active transport options, such as walking, cycling and public transport. *Issue* promotion is a long way from '**fostering** an urban form that **enables** the use of active and public transport.'	**Greener, wilder and climate resilient region** **Ideas Proposed in GARP** 1. Continue to have a target for walkable communities that is annually benchmarked and reported 2. Identify sites for strategic infill along major corridors, transport routes, and activity centres serviced by rapid transit public transport 3. Identify new areas for renewal, as our major strategic brownfield sites such as Lightsview and Bowden become full 4. Plan new greenfield growth near existing or new employment nodes 5. Capitalise growth in areas with existing open space networks in the CBD, along river corridors and near major urban parks 6. Capitalise growth in areas well serviced by active travel networks, including designated cycle ways, such as the Mike Turtur and Amy Gillett bikeways. *Issue* Idea 2, the focus of strategic infill along major corridors and transport routes will entrench private car use and exacerbate the associated environmental issues. Idea 4, any greenfield growth should be prioritised near public transport routes that service existing or new employment nodes. Idea 6, the existing cycle ways are not sufficient to support the existing population more need to be delivered combined with other mechanisms such as improved cycling and walking connection to existing mass transit stations, bike racks on buses, lowered speed limits etc *Recommended enhancement* 2. Identify sites for strategic infill in activity centres serviced by rapid mass transit, at interchanges and key public transport stops/stations, and along existing and planned public transport routes. 4. Plan any new greenfield growth near public transport routes that service existing or proposed new employment nodes.

		7. Capitalise growth in areas well serviced by active travel networks, including designated cycle ways, and continue to introduce better and safer active transport networks in the existing Greater Adelaide Region servicing activity centres, school etc. **8.** Foster an urban form that enables the use of active and public transport *This needs to be accompanied by clear and tangible objectives of proven interventions that truly enable the use of active and public transport.*
	Equitable and socially cohesive **GARP comment** • Identify areas for growth that are or can be serviced by cost effective infrastructure and maximise positive social outcomes. *Issue* The concept of 'cost effective' is likely to be interpreted in simplistic terms as 'financial' cost rather than taking account of the full range of costs (e.g., costs of transport disadvantage, costs of serve passenger journeys, independent access) associated with the supply of different types of transport infrastructure. *Recommended enhancement* Identify areas for growth that are or can be serviced by socially, environmentally, and economically effective infrastructure to maximise positive social outcomes.	**Equitable and socially cohesive** **Ideas Proposed in GARP** 1. Concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure (e.g., roads, schools, healthcare, water). 2. Prioritise and stage the release of zoned land based on transparency of costs to the community of different forms of housing supply (including upfront development and ongoing living costs). *Issue* Idea 1. This Idea needs to align with the sentiments on increasing public transport use expressed in the Discussion Paper. As it stands it fails to identify heavy/light rail and the O-Bahn (e.g., at/adjacent to interchanges) as potential areas for growth. *Recommended enhancement* 1. Concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure (e.g., public transport corridors including heavy/light rail, O-Bahn and roads, schools, healthcare, water)
	Smarter, cleaner, regenerative future **GARP Comment** • Identify employment land supported by strategic infrastructure.	**Smarter, cleaner, regenerative future** **Ideas Proposed in GARP** 1. Identify and protect industrial land to provide employment to growing communities, including in key areas such as:

	Issue 'Strategic infrastructure' does not indicate how employees will access these sites.	• Along the South-Eastern Freeway at Monarto, to support growth in Murray • Bridge and Mount Barker • On the Fleurieu Peninsula, to support growth in Goolwa and Victor Harbor • At Greater Edinburgh Parks, with appropriate infrastructure and key freight connections • At Lonsdale • In North-western locations, including Gillman, Wingfield and LeFevre Peninsula. *Issue* Simply locating industrial land near growing communities does not guarantee access for potential employees. *Recommended enhancement* **1.** Identify and protect industrial land served by existing or planned mass transit to provide and ensure access to employment for growing communities, including in key areas.
	Housing choice in the right places • Target housing growth in areas well serviced to maximise previous or planned investments in transport and other infrastructure. • Identify areas for new growth that can be supported by cost-effective infrastructure. *Issue* Housing growth needs to be targeted to maximise previous and planned investments in public transport not transport *per se.*	**Housing choice in the right places** 1. Prioritise and sequence the release of zoned land based on transparency of costs to the community of different forms of housing (including upfront development and ongoing living costs) 2. Prioritise strategic infill sites that are generally more economic to service than general infill 3. Focus infill supply in locations where there is capacity in infrastructure networks 4. Build on existing infrastructure capacity in townships where local councils identify growth opportunities. *Issue* Cost calculations described in the discussion paper do not include the full range of social, environmental, and economic costs associated with different housing locations. Future cost calculations need to include these dimensions.
SPP 3 – Adaptive Reuse	**Equitable and socially cohesive** **GARP Comment**	**Equitable and socially cohesive** **Idea Proposed in GARP**

	• Identify opportunities to enhance areas of cultural or heritage value *Issue* This is limited in scope *Recommended enhancement* Identify opportunities for transforming car parks into mixed used developments including housing.	1. Identify underused buildings to provide cultural, social and economic benefits and target for investment (include underused historical precincts and assets). *Issue* There are broader, innovative opportunities for adaptive reuse. For example, car parks can be transformed in mixed use developments including housing. *Recommended enhancement* • Identify underused buildings, car parking facilities (at grade and multi-level), and underutilised land to provide cultural, social and economic benefits and target for investment (include underused historical precincts and assets).
SPP 6 – Housing Supply and Diversity	**Equitable and socially cohesive** **GARP Comment** • Identify housing opportunities in areas well-connected to services, employment, and infrastructure. *Issue* Fails to include public transport in contrast to the various statements throughout the GARP Discussion Paper.	**Equitable and socially cohesive** **Idea Proposed in GARP** 1. Identify strategic infill sites to provide more housing choices in areas near public transport, services, and employment options. *Issue* For reasons outlined above, all housing supply will need to be in areas near existing or planned public transport, services, and employment options. *Recommended enhancement* 1. Identify strategic infill sites and sites near existing townships to provide more housing choices in areas near existing or planned public transport, services, and employment options.
	Smarter, cleaner, regenerative future **GARP Comment** • Identify housing opportunities that support the economic viability of strategic centres.	**Smarter, cleaner, regenerative future** **Idea Proposed in GARP** 1. Identify regeneration and strategic infill opportunities in and around urban centres such as Noarlunga, Marion, Tea Tree Plaza, and Elizabeth. *Issue*

		Similar to the idea for adaptive reuse, this Idea could explore other opportunities for mixed use and housing development such as car park areas at major shopping centres. *Recommended Enhancement* 1. Identify regeneration and strategic infill opportunities in and around urban centres such as Noarlunga, Marion, Tea Tree Plaza, and Elizabeth including adaptive re-use of car parks.
SPP 9 – Employment Lands	**Equitable and socially cohesive** **Identified in GARP** • Identify employment lands well serviced by public transport, and which provide an attractive place to work.	**Equitable and socially cohesive** **Idea Proposed in GARP** 1. Distribute sufficient employment lands to meet local demand for jobs and reduce travel distances 2. Identify areas for mixed-use developments that bring together housing, jobs and lifelong learning. *Issue* This Idea needs to align with the sentiments on increasing public transport use expressed in the Discussion Paper. Reducing travel distances does not inherently translate to reducing private car travel. *Recommended enhancement* 1. Identify employment lands well serviced by public transport, and which provide an attractive place to work.
	Smarter, cleaner, regenerative future **GARP Comment** • Identify sufficient employment lands in appropriate locations to meet future demand for traditional and new industries.	**Smarter, cleaner, regenerative future** **Ideas Proposed in GARP** 1. Protect and capitalise on employment land in the Inner Metro and Inner Southern regions for future knowledge-based industries and innovation precincts 2. Identify sufficient employment land to service growing populations in areas including Mount Barker, Murray Bridge, Northern Adelaide, Goolwa, and Victor Harbor.

		These are both especially important and the need for access by public transport needs to be reiterated.
SPP 11 – Strategic Transport Infrastructure	**Noticeably absent from the GARP discussion paper** • Foster development that enables high levels of public transport use, walking, cycling and micro-mobility, to reduce reliance on private car travel.	*We recommend* 1. Identify sites for new development within 400metres of existing or planned high quality public transport. 2. Ensure safe, direct, convenient walking, cycling and micro-mobility networks to destinations within and beyond new developments.

[i] For example, South Australia Planning Review (1992) 2020 Vision: A Planning Strategy for Metropolitan Adelaide, Adelaide City Council (2012) Smart Move: The City of Adelaide's Transport and Movement Strategy 2012-22. Adelaide.

[ii] Infrastructure SA (2020). *20 Year State Infrastructure Strategy*. Infrastructure SA: Adelaide p. 125

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[iv] For example, Hamilton, C., & Kellett, J. (2017). Cost comparison of infrastructure on greenfield and infill sites. *Urban Policy and research*, *35*(3), 248-260.

[v] Unlike the GARP discussion paper, the Productivity Commission includes the supply of public transport in its calculations. NSW Productivity Commission (2023) Building more homes where infrastructure costs less. productivity.nsw.gov.au.

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Transport Action Network

Greater Adelaide Public Transport:
A Network for 21st Century Challenges
2023

Tom Wilson and Jennifer Bonham PhD
for the
Transport Action Network

Contents

1	Executive Summary	4
2	Planning for the Growth of Greater Adelaide	6
3	Transport: Why Public Transport Matters	8
	3.1 Environmental Sustainability	8
	3.2 Social Cohesion, Equity, and Housing Affordability	9
	3.3 Economic Sustainability	10
4	'Doing' Sustainable Transport and Land Use Integration	13
	4.1 'Doing' Integration	13
	4.2 Elements of an Efficient Public Transport Network	13
5	Reinvigorating Heavy Rail	16
	5.1 Underground City Rail Loop	16
	5.2 Northern Heavy Rail	21
	5.2.1 Virginia, Riverlea, Two Wells and beyond	21
	5.2.2 Gawler, Roseworthy, Concordia	22
	5.2.3 Lyndoch, Tanunda, Nuriootpa, Angaston	24
	5.2.4 Outer Northern Suburbs to LeFevre Peninsula Public Transport for AUKUS Employees	25
	5.3 Southern Heavy Rail	26
	5.3.1 Adelaide Hills	26
	5.3.2 Seaford Line Extension	27
	5.3.3 Victor Harbor to Goolwa	28
	5.3.4 Flinders Line Extension	28
6	Re-considering Light Rail/Tram	29
	6.1 Adelaide Airport and Inner-West	29
	6.2 North Adelaide and beyond	31
	6.3 Northwest – Outer Harbor and Grange	31
	6.4 Southeast	33
7	Buses	35
8	A Fairer Fare System	37
	8.1 Short Distance Fares	37
	8.2 Long Distance Fares	37
	8.3 Emerging Opportunities	38
9	Public Transport: Meeting the Challenges	38
	Transport Action Network	39
	Acknowledgements	39
	References	39

Figures, Photos and Tables

Figures		
1	Data Sources: DIT Annual Reports and Infrastructure SA	6
2	Underground City Rail	18
3	Virginia, Riverlea, Two Wells and beyond	22
4	Gawler, Roseworthy, Concordia	23
5	Beyond Gawler, The Barossa via Concordia	24
6	Extension of the Seaford Line, Aldinga, Sellicks Beach and beyond	27
7	Investigation into extending the Flinders Line/Reactivation of Willunga Rail Corridor	27
8	Adelaide Airport and Inner West - Connecting to North Terrace and New WCH/RAH	30
9	Conversion of Outer Harbour and Grange Lines to Light Rail, extensions in Grange, Port Adelaide and Semaphore, full integration with existing CBD tram network.	32
Photos		
1	Value Capture, Walkability and Connectivity at Bowden, South Australia	15
2	Value Capture and Walkability at the tram interchange, Bordeaux, France	15
3	Heavy rail, Mawson Lakes, South Australia	21
4	Heavy rail, Seaford, South Australia	28
Tables		
1	Access Time Difference: Current vs Underground Loop	19

1. Executive Summary

The Greater Adelaide Region needs an **integrated land use and transport plan** to meet the challenges of housing affordability, population health, social equity, environmental sustainability, and economic development. The future is multimodality where people use a variety of modes of transport across a day, week, month, or year. Currently, we do not have data that readily captures multimodality.

This Paper focuses on public transport forming the backbone of a vibrant, equitable, and prosperous region. It conceptualises public transport infrastructure and services as a *network*, not a system, to emphasise movement from anywhere to anywhere across Greater Adelaide with changes in direction enabled at key transfer and activity nodes.

The Paper offers a range of proposals for improved public transport in both newly developing and established areas across Greater Adelaide.

TAN's foremost ask is that public and active transport planning forms a central component of the new Greater Adelaide Regional Plan.

Most transformational amongst TAN recommendations is the connection of the north and south rail lines and the creation of several new CBD stations via an Underground City Rail Loop. These interventions are considered fundamental to improving the efficiency, accessibility, service frequency and patronage of the Adelaide heavy rail lines and, by extension, would greatly enhance the operation of the entire public transport network. As a priority, we recommend developing the case for this project and preparing an application for Federal Government infrastructure funding.

We outline a variety of proposed requirements for heavy rail, light rail/tram, and bus services in newly developing and established areas, including expanding Adelaide Metro services into towns and communities which form part of the Greater Adelaide Region.

As localities flagged for significant future growth, we propose reinstating rail services in the outer north-west to Riverlea, Virginia and Two Wells and in the outer north-east from Gawler to Concordia, Roseworthy, and the Barossa. We propose an urgent trial of a reinstated rail service to Mt Barker with an extension to Murray Bridge in the longer term, extension of the Seaford line to Sellicks Beach, and in the longer term, investigation of extensions from both Sellicks Beach and Flinders University.

In the near term, we recommend investigating light rail to the airport via Keswick Creek and, in the longer term, investigating conversion of the Outer Harbor and Grange heavy rail to light rail to enable greater long-term expansion.

Improvements to bus services include implementing peak hour bus priority lanes, extending the operating hours of Go Zone services, and implementing or increasing services that connect town centres.

We anticipate all public transport services to be supported by walkable neighbourhoods and integration into local and metropolitan cycling/micro-mobility networks.

The Federal Government's commitment to rejuvenating Australia's rail network and its renewed focus on Cities and Suburbs has created the right conditions for public and active transport plans that create a lasting positive legacy for Greater Adelaide.

Priority recommendations:

- Conceptualise and plan for public transport as an anywhere-to-anywhere network.
- Embed public transport in the Greater Adelaide Regional Plan, Infrastructure SA Plan, and Green Energy Transition Plan.
- Commence analysis, consultation, planning, and seeking funding for underground CBD loop.
- Commence trial of the Mt Barker line.
- Secure rail corridors to areas identified for new development including Sellicks Beach, Concordia, and Two Wells.
- Integrate safe, convenient walking and cycling routes with existing and future train stations and public transport interchanges.
- Progressively expand bus priority lanes on arterial roads and extend Go Zone network and operating hours.
- Implement a fairer fare structure and expand Adelaide Metro across the Greater Adelaide Region.
- Investigate light rail via Keswick Creek to the airport.

2. Planning for the Growth of Greater Adelaide

The challenges we face in terms of environmental sustainability, equity within and across generations, housing supply and affordability, aging of the population, personal health, amenity, liveability, attracting industry investment, and retaining a skilled workforce all demand a sophisticated approach to guiding the development of Greater Adelaide. The location of new development, whether within the established urban footprint, in greenfield sites or regional centres, requires judicious decision making. It is wise to augment populations in existing centres and ensure any new housing estates have the threshold populations required to support local services from the outset of occupancy and avoid additional or longer journeys. Any proposed development requires close alignment with sustainable forms of transport so that people can move safely and efficiently in their local areas by active transport while maintaining public transport access to opportunities across the broader region.

Since the Metropolitan Adelaide Plan was adopted in 1962, Adelaide has been developed as a low density, dispersed metropolis. This dispersed settlement was to be facilitated by a network of motorways and cloverleaf interchanges according to the 1967 Metropolitan Adelaide Transportation Study (MATS). The public transport components of MATS were largely ignored in the subsequent debates over the Study and almost lost to history when the motorway components of MATS were rejected by Adelaide residents. However, from the mid-1990s, variations of the motorways and ring routes envisaged in MATS have been designed, funded, and constructed but the Public Transport projects have been somewhat overlooked.

South Australians have demonstrated their commitment to using quality public transport with a resurgence in light rail patronage after the upgrade of the Glenelg line and on-going high patronage of the O-Bahn. Public transport patronage peaked at 76.1million in 2018/19 and slumped during the COVID pandemic (commencing early 2020) as people worked from home or changed modes.[1]

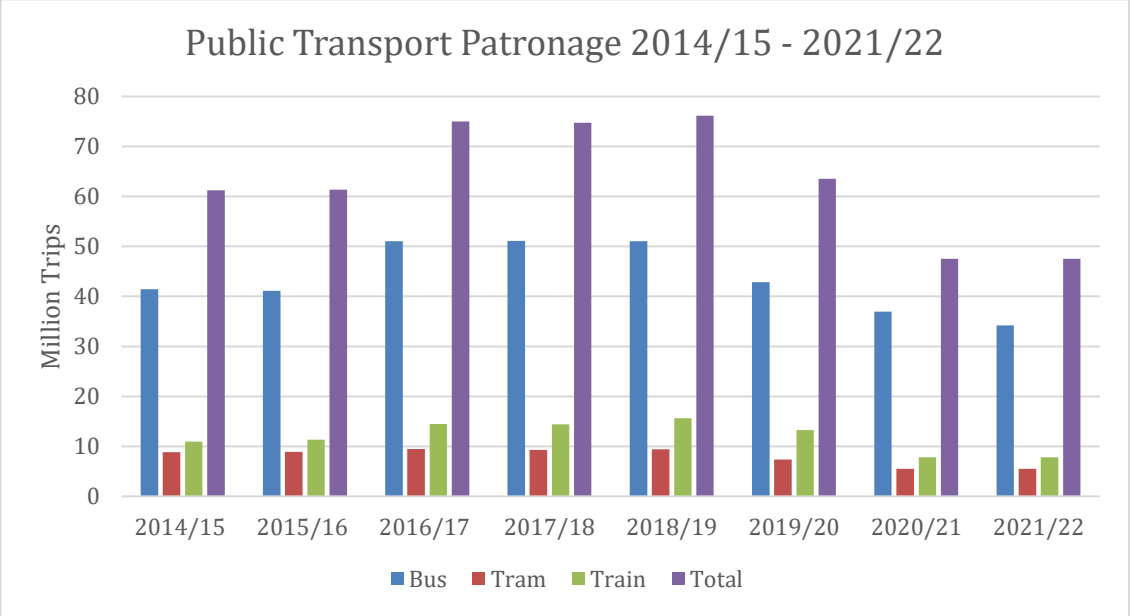

Figure 1. Data Sources: DIT Annual Reports (2014/15-2021/22)

Together the Greater Adelaide Regional Plan and the Passenger Transport Strategy offer a once in a generation opportunity to put both Greater Adelaide and South Australia on a pathway to sustainable transport and land use integration.

Despite our significant concerns about the expanding urban footprint, the announced new land releases and potential development in regional towns offers an opportunity to plan and deliver a comprehensive public transport *network* for Greater Adelaide.

Conceptualising public transport as a *network* anticipates people moving anywhere-to-anywhere across Greater Adelaide with transfer nodes allowing fast, smooth changes in direction. A *network* approach calls for the expansion of Adelaide Metro services and a fairer fare structure. Currently, communities beyond the reach of Adelaide Metro are served by limited frequency, commercially operated bus services with high fares and little to encourage patronage. Councils in these areas are concerned about the risks to their communities of poor public transport services.[2] These risks will be exacerbated if proposed increases in population are not accompanied by significant investment in public transport. The Brisbane and Perth public transport networks stretch for 180 km and 120 km north to south respectively. It is time for the South Australian Government to expand Adelaide Metro to better serve all communities within the Greater Adelaide Region.

TAN's Paper 'Greater Adelaide Public Transport: A Network for the 21st Century' uses a *network* approach to public transport. It anticipates integration of heavy rail, light/rail and bus routes with active transport networks and land use planning practices that locate people in safe, convenient, inclusive comfortable active transport reach of the everyday services and facilities they need. Our paper focuses on heavy rail as a central component of the Greater Adelaide transport network as it can carry people efficiently to employment, education, social and cultural hubs across several stops or the entire metropolitan area.

Although this paper addresses the Greater Adelaide Region, TAN strongly supports further investigations into: investment in regional passenger and freight rail, enhancing intra- and cross- regional bus services, and improving bus services in regional centres.

3. Transport: Why Public Transport Matters

Transport plays a critical role in everything we do. It is one of the most effective platforms to address the environmental, social, and economic challenges facing the Greater Adelaide Region. Share and private vehicles, including driver deferred vehicles, will meet some of Greater Adelaide's future transport needs. However, they cannot serve as the backbone of the Region's long term transport network. A comprehensive public transport network well-integrated with local land uses and active transport (walking, cycling, scooting, and skating) networks is vital to addressing each of these challenges together.

3.1 Environmental Sustainability

Urban heat, stormwater runoff and pollution (air, soil, and water) are widely acknowledged and well understood road transport environmental issues. They are key factors in warning against increasing road capacity with major new road infrastructure and intersection and road widening projects. For the past 30 years, the front of mind environmental issue for transport researchers has been climate change.

The transport sector contributes 19% (93million tonnes (Mt)) of Australia's GHG emissions. These emissions are forecast to increase to over 24% (103Mt) by 2030 and despite starting to fall after that date they will still be above current levels (99Mt) in 2035.[3] Increases in emissions are due to uptake of vehicles such as SUVs and increasing activity of medium and heavy-duty trucks.[4]

While leading the country in reducing electricity sector emissions, South Australia is lagging on transport emissions. South Australia's transport sector emissions are 29% (6.3Mt) of total emissions with passenger vehicles[5] accounting for 45% (2.8Mt) of these emissions.[6]

Fuel efficiency standards, electric and hydrogen powered vehicles, incentive programs for electric and hydrogen fuel cell vehicle uptake, and rollout of electric battery charging stations are part of the solution to reducing transport sector GHG emissions. Renewable energy sources will eventually eliminate vehicle *operating* emissions and, in decades to come, recycling and green manufacturing will reduce vehicle production related emissions. However, the pace of change will not be fast enough for transport to play its role in keeping global temperature increases to 1.5 degrees Celsius. Further, environmental concerns around critical minerals mining and materials such as micro-plastics will need to be addressed to improve the 'green credentials' of renewable energy powered vehicles.

South Australia has over 1.38m cars and sports utility vehicles in its fleet and on current trends this will reach 1.72m by 2050.[7] Only, 0.5% of Australia's vehicle fleet is fully electric and electric vehicles make up 3.8% of annual new vehicle sales.[8] This figure is projected to increase to 23% of new vehicle sales by 2030.[9] The second hand car market, where commercially registered electric vehicles are sold as passenger vehicles, will also assist in the transition to a no-carbon transport fleet. However, even if we had 100%

uptake of electric (or hydrogen fuel cell) vehicles as of today (August 2023), it will take three decades to transition to a renewable energy powered passenger vehicle fleet.[10] Transitioning the vehicle fleet to renewable energy sources is essential but it is an adjunct to, not the centre piece of, a rapid reduction in transport sector GHG emissions.

South Australians want to participate in reducing their GHG emissions. A comprehensive public transport network well-integrated into local neighbourhoods with direct, safe, and amenable walking and cycling routes will be fundamental to reducing GHG emissions and improving the amenity and environmental quality of neighbourhoods. Patronage on the O-Bahn and Glenelg light rail routes are testimony to the keenness of South Australians to use quality public transport services.[11] Enabling more people to catch public transport through improved services, better local access and expanded infrastructure can quickly reduce transport sector GHG emissions.

3.2 Social cohesion, equity, and housing affordability

Public transport services are essential to independent access for all South Australians. About 70% of South Australians are reported to hold a driver's licence but not all licence holders own, have access to, or are able or confident to use a car for all the journeys they want to make.[12] This is particularly so for the 20% of licence holders (250,000 people) in younger and older age cohorts. Older people modify their journeys, such as the distances and times of day they travel, as they age and transition away from driving.[13] Those who have used a mix of modes throughout their lives and have good access to other modes (active and public transport, mobility scooters) are in a better position to relinquish a driver's licence altogether.[14] Younger people, particularly teenagers and older children, are also put at risk through poor transport options. Lack of public transport combined with a built environment that fails to provide for active transport (walking, cycling, scooting, and skating) undermines their independent mobility and the social and spatial skills developed through this independence.[15]

In Australia, it is women who continue to provide the greater share of transport services, 'mobility of care journeys,' for family members, friends and others in their networks who do not have access to reliable transport options.[16] There can be positive dimensions to these 'serve passenger' journeys but as a regular responsibility it often brings additional stress into everyday routines. Driver deferred (aka autonomous) vehicles may, in the long-term, provide access for a greater proportion of the population but this comes with the risk of increasing rather than reducing traffic congestion and requiring additional infrastructure.[17] A comprehensive public transport network well-integrated with active transport networks can ensure independence and equity for the vast majority, of our population.

Quality of public transport varies significantly across Greater Adelaide and the South Australian regions. Providing new housing in outer suburban and peri-urban areas without quality public transport services and integrated active travel networks is untenable. It will continue to create transport disadvantage and exacerbate cost of living and affordability pressures. Savings on lower cost housing is lost if families must buy

second (and as their children grow up third or fourth) cars to meet their transport needs. In 2022, the cost of owning, maintaining, and running a car for Adelaide residents was put at over $17,000.[18] Fuel accounted for 26% of this cost and it will be exacerbated as petrol prices remain high for the foreseeable future and forecast 'oil shocks' create price spikes.[19]

International research indicates millennials (those born from the early 1980s to late 1990s) are more likely to be multimodal (use a range of modes) than older age cohorts. Millennials are reported to be more likely to walk, cycle and use public transport.[20] Of course, millennials are not a homogeneous group and socio-cultural factors have a bearing on transport mode. Further, there is a risk they will become mono-modal, particularly car dependent, as they move through lifecycle stages (e.g., partnering, having children) and moving to locations more affordable for a family, if these locations do not provide the full range of transport options.

Traditional cost benefit analyses (CBA) often report low return on investment for additional public transport services. Using traditional cost benefit analysis for Adelaide's O-Bahn showed a Benefit-Cost ratio of 0.7, yet the O-Bahn has been highly successful. This shows that traditional cost-benefit analysis either needs to be modified or at least not be the only factor in determining the worth of a project. Recent research indicates that the direct value of additional public transport services is significantly greater (4:1) in areas where people are at risk of mobility related social exclusion.[21] Transport CBA's need to include the broader social, and physical and mental health dimensions of transport services and infrastructure projects. Masking the social and individual health expenditures associated with these dimensions distorts the CBA results.

3.3 Economic Sustainability

Infrastructure Australia and the Bureau of Infrastructure and Transport Research Economics (BITRE) have regularly warned of the rising costs of congestion across the Greater Adelaide Region.[22] Infrastructure Australia has acknowledged that congestion cannot be addressed by road building alone but requires significant investment in public and active transport. Research has consistently demonstrated that expanding road capacity increases the rate of traffic growth and the amount of traffic on the overall road network.[23]

The road building 'solution' may ultimately undermine the productivity of our urban environments. As Engineers Australia notes:

> Over 80 per cent of Australia's GDP is produced in cities, while the total transport sector (all modes) represents 7 per cent of GDP (ABS 2018). In this context, the local economy in an urban area may be worth more than any travel time savings from road upgrading.[24]

Road widening has opportunity costs in removing valuable urban land from other uses. In the case of major road projects, it is not only the roadway itself but adjacent land must be taken up to address the impacts of high traffic volumes and speeds. The financial costs of acquiring land and the costs to the community and local economy of displacing businesses and households means road widening is not a viable transport

solution into the future. Property acquisition made up a significant proportion of the costs of widening the Portrush/Magill, Fullarton/Glen Osmond, and Fullarton/Cross Road intersections. In addition, it is well understood that any expansion of the car-based infrastructure induces further car traffic (induced demand), through the perception of easier and quicker travelling amongst those who previously did not use these roads, eventually leading to loss of any short-term time savings and worsening congestion

By contrast, public transport projects can generate broader economic benefits. Clearly, one of these benefits is to increase patronage and move more people into and through a locality with a smaller infrastructure footprint than is possible by road. An SKM study into the Glenelg Tram extension reported a significant increase in daily patronage into, around and through the CBD once completed.[25] Further, a recent study in Melbourne, reported that improvements in heavy rail resulted in uplift benefits for properties within an 800metres of stations: that is, properties within the 800metre radius had a higher value (over 8%) than those in the surrounding area.[26]

The SKM study also identified a significant increase in employment in the CBD tram catchment area. This second point is echoed in a recent international review of the literature that shows with relevant land use policies light rail can increase employment in the catchment corridor with businesses able to improve access for employees by re-locating into these more favourable areas.[27] Employment access benefits have also been demonstrated for heavy rail, including in low density urban areas.[28]

The South Australian Economic Statement identifies four key workforce challenges in South Australia.[29] Two of these are directly related to transport.

- A *spatial mismatch* between the location of available jobs and willing workers—whether that's in regional parts of South Australia, within Adelaide's suburbs, or the state as a whole.
- The existence of *barriers to participation and utilisation*, particularly for marginalised groups, leading to poorer employment outcomes.

The supply of quality public transport within Greater Adelaide and across regions can connect workers to existing employment hubs and facilitate greater workforce participation by marginalised groups.

Individual rail line improvements are important but it is the extent and quality of the overall network, access to stations and the potential to travel anywhere across the network rather than to a single central destination, that makes services attractive and increases the return on investment.[30]

The health costs associated with sedentary lifestyles have been attributed, in part, to over-reliance on automobile travel. Active transport (walking and cycling) has been demonstrated to have a ROI of 13:1 and 5:1 respectively. The high return on investment for walking (13:1) and cycling (5:1) infrastructure makes the integration of public and active transport a worthwhile investment.[31] As noted in the previous section the health

impacts of transport infrastructure and services need to be included in Cost Benefit Analyses.

We need to ask whether it will be possible to attract or retain a skilled, well-educated workforce in Adelaide if the first thing they must do is buy a car to achieve a modest level of access?

Public Transport for the 21st Century

Overall, Greater Adelaide will lag on goals of prosperity, equity, sustainability, and liveability if we simply substitute electric/hydrogen power for fossil fuel vehicles and plan for the transport status quo. This paper offers proposals for a comprehensive public transport network integrated into walking and wheeling networks to reduce the extent and cost of congestion and provide greater, more equitable access for all people living in and visiting Greater Adelaide. We cannot afford to be inactive or even worse, take counter-productive actions to delay the transition towards socially, environmentally, and economically sustainable transport.

4. 'Doing' Sustainable Land Use and Transport Integration

4.1 'Doing' Integration

'Doing' integration means thinking transport and land use together. It will vary according to: location - whether it is an established or newly developing area, existing and proposed land uses and their relation to each other, existing and proposed modes of transport, the design, construction, and regulation of infrastructure that enables access. Above all, doing integration will be shaped by what we hope to achieve and the people we anticipate serving.

TAN is keen to ensure people can access everyday goods, services, and facilities within easy walking, cycling, scooting, or skating distance from their homes. It would be ideal to access employment, education, social and cultural opportunities close to where people live. Remote access will make more of these opportunities available over time and this will increase the importance of local neighbourhoods. For the foreseeable future, people will still want or need to travel beyond their local area. Quality public transport will be essential for accessing non-local opportunities. Public transport can operate more efficiently than the private car to areas with a high concentration of activities. Following from this, it can reduce the use of private cars and therefore reduce their impact on both those activity centres and local neighbourhoods.

Public transport nodes can also operate as community hubs with local shops and community services located at stations and interchanges. Creating community hubs at public transport nodes reinforces the role of both hub and node. Increasing connectivity between public transport and retail/entertainment centres such as at Elizabeth, Playford and Tea Tree Gully can begin to create genuine community hubs. Public Private Partnerships to underground some car parking and a portion of land for medium density living can put people in closer proximity to the services they need and foster community hubs. Active transport access to community hubs/public transport nodes maintains the amenity of the hub and extends the reach of both public and active transport.

Achieving land use and transport integration means embedding the necessary infrastructure and regulations when planning new developments and ensuring they are delivered. In established suburbs it means retrofitting those suburbs to facilitate public and active transport access. TAN is currently working on a 'doing integration' project. In this paper we have focused on integrating public transport to create a network that ensures people can move anywhere to anywhere.

4.2 Elements of an Efficient Public Transport Network

The Queensland Department of Transport and Main Roads has published a comprehensive guide to Public Transport Network Infrastructure.[32] TAN has adapted a few of their recommended approaches below. These are proposed as guiding principles for further developing Adelaide Metro as a well-functioning and accessible public transport network.

Connectivity

- Network. Transport infrastructure and services should be designed as a network, for efficiency as well as ease of movement across Greater Adelaide. Conceptualising public transport as a network, rather than an A to B system, emphasises movement between key transfer and activity nodes, which enable efficient changes in direction.
- Local. Walking and wheeling (cycling and micro-mobility) infrastructure is inexpensive and provides for deeper connectivity into local neighbourhoods. Personal and environmental benefits of walking and wheeling can only be realised when these modes are prioritised with direct, safe, comfortable, well-shaded and legible routes.

Convenience and Catchment

- Stops and stations are to be conveniently located for pedestrian access – e.g., generally within 400m-500m of homes (origins) and centrally within activity centres (destinations). Patrons may choose to walk longer distances, such as to high-quality rail services, however the intention of the network as-a-whole is to offer a high level of accessibility and fine-grained connectivity.
- Cycling and micro-mobility extend public transport catchment areas and facilitate better access in dispersed suburbs. Secure, conveniently located bike parking at train stations and major bus/tram stops will enable bike access. Public transport services that are only conveniently accessed by car not only encourages car use but also pushes up demand for expensive Park'n'Ride facilities.

Transfers

- Seamless transfers between services are fundamental to network efficiency. Weather protection, comfortable conditions, and short transfer times at key nodes and activity centres make for quality customer experience.

Speed and frequency

- Public transport vehicles *operate most efficiently in their own right of way*. Bus priority lanes, at least during peak hour, will improve the efficiency of the bus network and make it more attractive to shift mode away from the car.
- High service frequencies encourage public transport as it allows people to 'turn up and go,' taking the anxiety out of using public transport, and maximising flexibility for patrons.

Value Capture

- Land use planning at and around train stations and bus interchanges should seek to increase activities and residential opportunities through carefully considered mixed use development. Stations and interchanges need to be designed to seamlessly integrate into surrounding activity spaces.

Photo 1: Value Capture, Walkability and Connectivity at Bowden, South Australia (Jennifer Bonham)

Photo 2: Value Capture and Walkability at the tram interchange, Bordeaux, France (Tom Wilson)

5. Reinvigorating Heavy Rail

Train services provide for the outward expansion of urban development more effectively than buses alone. It is essential to identify, secure and maintain suitable corridors for rail into areas subject to urban and regional development in the next 50 years. Regional and interstate railways should be evaluated and secured for new, revived, and realigned services. Hybrid battery/electric powered trains can reduce the cost of converting Adelaide's diesel trains to renewable energy.

Valuing rail users is essential to retaining and increasing heavy rail patronage. In areas where increasing land use intensity is not possible in the short term, the quality of access to stations is essential to maximising patronage.[33] Upgrading stations and station precincts, investing in existing public transport network connectivity and prioritising access for feeder bus services, and investing in safe, direct, and convenient local active transport connectivity represent immediate opportunities to deliver better, more accessible, and more attractive environments and services.

5.1 Central – Underground City Rail Loop (Figure 2)

The entire public transport network can be transformed by connecting the northern and southern lines via an underground CBD loop. This connection has been included in metropolitan Adelaide and City of Adelaide plans and strategies since the 1960s and it is a project that's time has come. Infrastructure SA has acknowledged the functionality and attractiveness of Adelaide's heavy rail network is constrained by the limitations of having only a single, non-centrally located, CBD station.

> The terminus nature of the Adelaide Railway Station puts a natural constraint on the rail network as it limits the number of trains that can be put into service at any one time and results in frequencies of 15–30 minutes for most services…the terminus nature of the Adelaide Railway Station will need to be reviewed with the potential to create a CBD rail loop. While this will provide operational efficiencies, any study should also consider the potential economic benefit of enabling more intensive development of CBD employment precincts when needed, and a shift to greater public transport use in existing intensive employment zones such as the Royal Adelaide Hospital and BioMed City precinct.[34]

The underground loop will improve access across the metropolitan area as well as throughout the CBD. Such important infrastructure projects have occurred in all other Australian mainland capital cities (e.g., Sydney's Underground Loop and new Cross-Harbor North West to South West Line, Melbourne's Underground Loop and Metro 2, and Cross River Rail in Brisbane) as well as Auckland, New Zealand.

Connecting the northern and southern rail lines via an underground city rail connection will have the following **benefits**.

- Significantly reduces train time at the station and associated operating costs allowing for productivity gains with more services per shift.

    - Currently there is up to 8minutes delay on every train as drivers change ends when stopping at the Adelaide Railway Station.

- Addresses suppressed demand for cross metropolitan journeys.
    - Currently, transferring passengers at Adelaide Railway Station must change platforms and can take from 1minute to well over 20 minutes for a connecting train. The average wait times for a sample of north-south connecting services (62 peak and afternoon services) is 12 minutes.
    - In the Underground loop it is likely that trains for several different lines will share the same platforms, following each other through the loop, or stopping on either side of the same Island platforms. In such cases changing between trains will involve virtually no walking (just wait a few minutes) or crossing an island platform (less than one minute's walk).
    - A more attractive rail service can spur more intense development at select suburban stations.

- Enables the creation of several new CBD stations that will:
    - increase access and convenience for passengers,
        - currently people with destinations of more than 10minutes walk from Adelaide Railway Station are less likely to catch the train (see Table 1), and
    - effectively triple the train catchment area and facilitate greater utilisation of trains,
        - currently Adelaide rail patronage is 1/3 of Perth CBD and 1/4 of Brisbane CBD.

- New stations will facilitate interchange with to all other city public transport services.
    - A station near Hindmarsh Square would link with buses on Grenfell Street (including the O-Bahn) and Pulteney Street.
    - A station at Victoria Square would link with the trams and with all King William Street buses.
    - A station at Whitmore Square would link with buses using Morphett Street and Sturt Street.
- Modifying existing Adelaide Station buildings and platforms can facilitate services that do not utilise the underground rail tunnel, such as interstate and regional services, and provide space for other activities.
- Modifying track requirements at Mile End and leading into the Adelaide Railway Station could see land made available for other uses such as a return to parklands.

- Utilising expertise and workforce capacity developed with the Torrens to Darlington (T2D) project and incorporating knowledge developed interstate in the Metro 2 and Cross River Rail projects.

The Time Has Come

Advocacy for this project sits at the intersection of three key factors: the Federal Government's renewed focus on heavy rail, Infrastructure Australia's revised assessment criteria to include Climate Change, and the opportunity to apply for Federal Grant funding for a major project beyond Torrens to Darlington.

An underground loop is estimated to cost $3b - $5b and modern tunnel boring machinery (TBM) now being used extensively internationally can undertake much of the work.

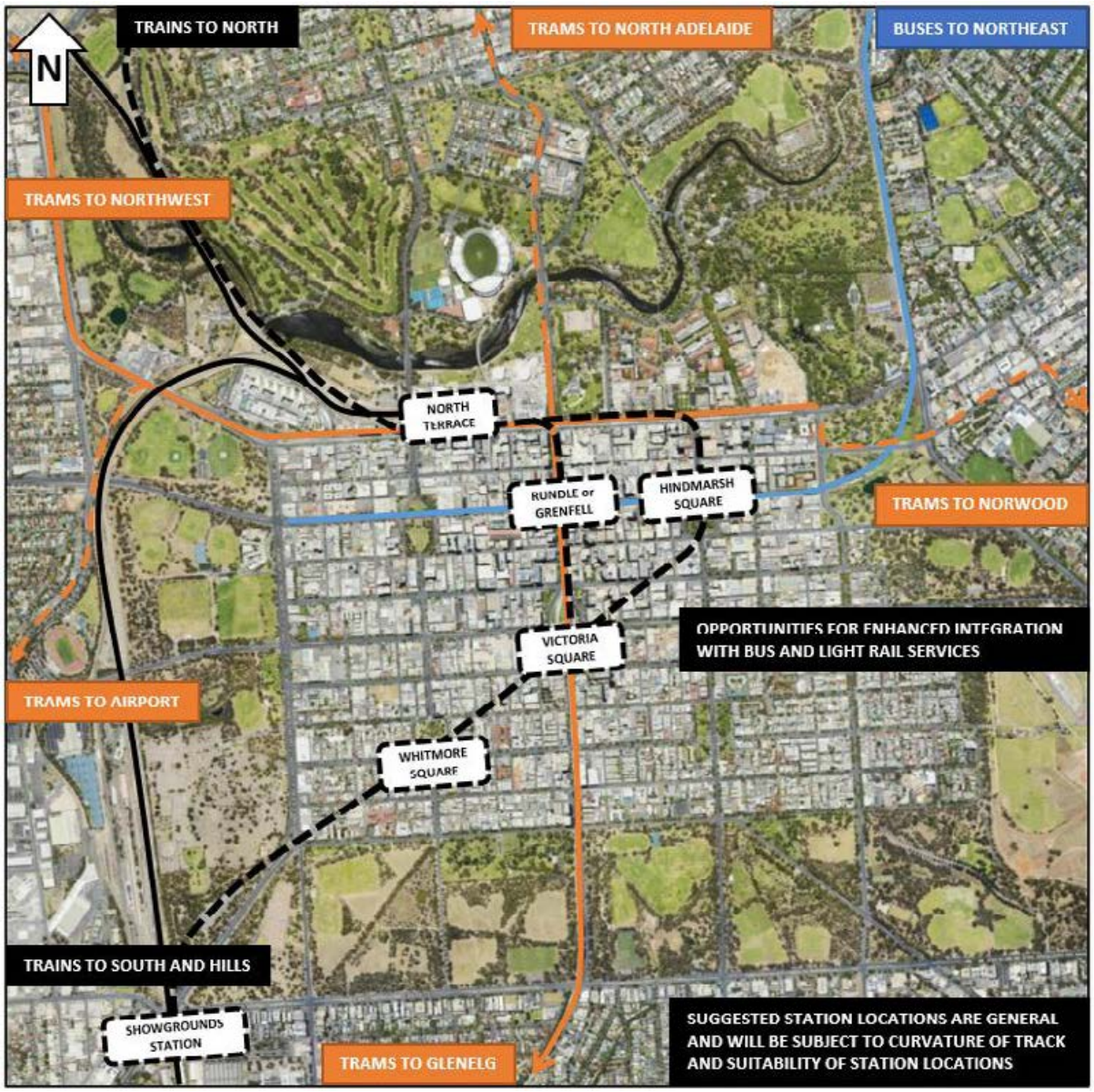

Figure 2: Underground City Rail (Map adapted from SAPPA). Possible routes for an underground loop integrating with buses on Grenfell Street, including the O-Bahn, and existing and potential new tram routes.

Table 1: Access Time Differences: Current vs Underground Loop

Destination/ Service	Seaford, Flinders & Belair Lines (from Showground Station)	Time in Minutes**	Gawler Line (from Ovingham Station)	Time in Minutes**
Adelaide Railway Station	Current	7	Current	6
	Via New Loop	12	Via New Loop	6
Hindmarsh Square*	Current: 7(T) + 18 (WW)	25	Current: 6(T) + 18 (WW)	24
	Current: 7(T) + 8 (WW) + 8 (T/B)	23	Current: 6(T) + 8 (WW) + 8 (T/B)	22
	Via New Loop: 9(T)	9	Via New Loop: 9(T)	9
Victoria Square*	Current: 7(T) + 16(WW)	23	Current: 6(T) + 16(WW)	22
	Current: 7(T) + 4(WW) + 11 (T/B)	22	Current: 6(T) + 4(WW) + 11 (T/B)	21
	Via New Loop: 6(T)	6	Via New Loop: 12(T)	12
Whitmore Square*	Current: 7(T) +23 (WW)	30	Current: 6(T) +23 (WW)	29
	Current: 7(T) + 10(WW) +10 (T/B)	27	Current: 6(T) + 10(WW) +10 (T/B)	26
	Via New Loop: 3(T)	3	Via New Loop: 15(T)	15

Notes: Current – all trains via Mile End; T – Train; WW - Walk and Wait (at lights/for tram or bus); T/B: Tram/Bus

*New Station

**The table uses actual times. Transport planners add weightings to items like walking and waiting that are based on passenger surveys of how annoyed or inconvenienced they are by walking and waiting. These are sometimes double the in-vehicle time.

Possible Routes:

- Trains from the north could dive underground in the vicinity of the rail yards, heading between the University buildings on North Terrace, under Morphett Street, and east beneath North Terrace and integrating with the Adelaide Railway Station underground.
- Trains could then turn to the south from North Terrace to Victoria Square, either via a direct route with a Central CBD station in the vicinity of King William / Rundle Mall / Grenfell Street or looping further to the east with wider coverage with a station in the vicinity of Pulteney Street / Rundle Mall / Hindmarsh Square. Both options would then continue from Victoria Square through the southwestern part of the CBD.
- Trains could then continue underground, emerging to link with the southern lines north of the Showgrounds Station. Trains from the south would follow the same route through the CBD in reverse of the above, linking with the northern lines west of Adelaide Station
- Tunnel boring machines are being used on other Australian undergrounding projects, increasing local knowledge and skills, and addressing issues of 'cut and cover' proposals. Cut and cover involves excavating a trench, covering with a tunnel support structure, and then refilling with excavated material. It is not really feasible in areas with above ground constraints – like buildings and precious parklands.
- The optimal alignment and location of new stations may be subject to constraints relating to the required curvature of the track and availability of suitable land for stations.

  Similar interstate projects are delivered with Federal Funding and South Australia has not sought funding for rail projects for some time. Rail projects will benefit from the new Infrastructure Australia assessment criteria which address climate change.

Photo 3: Heavy rail, Mawson Lakes, South Australia. (Jennifer Bonham)

5.2 Northern Heavy Rail

5.2.1 Virginia, Riverlea, Two Wells and beyond (Figure 3)

Housing construction is well underway at Riverlea and adjacent areas with a current population of approximately 11,000. The 2020 Land Supply Report for Greater Adelaide contemplates capacity for up to 23,000 new dwellings or 53,000 new residents. Currently, services and facilities in the area are limited and it is unlikely to be a significant employment hub in the short- to medium- term.

This area can be served by rail either by:

- Branching from the Gawler Railway at Salisbury and following, at least partially, the interstate railway via Direk and Virginia. This route would have the advantage of providing a link from Riverlea and Two Wells to Salisbury and other potential passenger destinations along the Gawler Line; or
- Branching from the Gawler Railway in the vicinity of Dry Creek and proceeding along the proposed freight corridor to the west of Port Wakefield Road to Virginia. This route would provide a faster link with Adelaide from Riverlea and Two Wells.

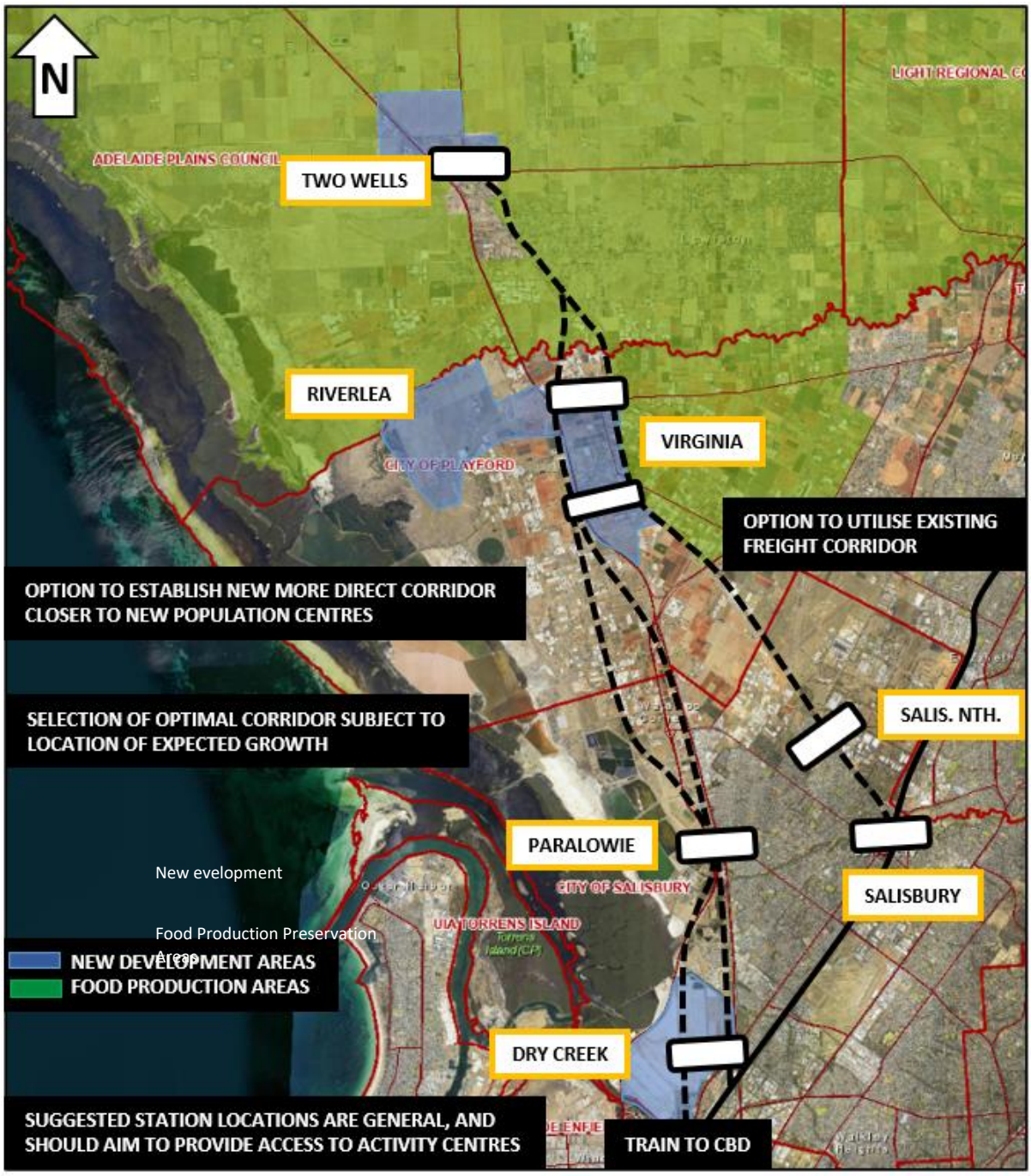

Figure 3: *Virginia, Riverlea, Two Wells and beyond (Map adapted from SAPPA)*

5.2.2 Gawler, Roseworthy, Concordia (Figure 4)

Current population approximately 31,500 – capacity for up to 17,500 new dwellings or 40,000 new residents is contemplated in the 2020 Land Supply Report for Greater Adelaide. Midway between Gawler and Lyndoch, there is a real risk that these towns will be overwhelmed by traffic if retail and community services are not provided in Concordia with first occupancy. If development of Concordia proceeds, it presents a vital opportunity

to create a walkable community hub around the train station with high quality public spaces, and a mix of services and facilities.

Existing disused railways already run through both Roseworthy and Concordia. These lines could be extended to both Concordia and Roseworthy in the shorter-term, with a potential longer-term extension to the major towns of Tanunda and Nuriootpa. Localised alignment improvements to increase the line speed and reduce travel times could be of benefit to the service.

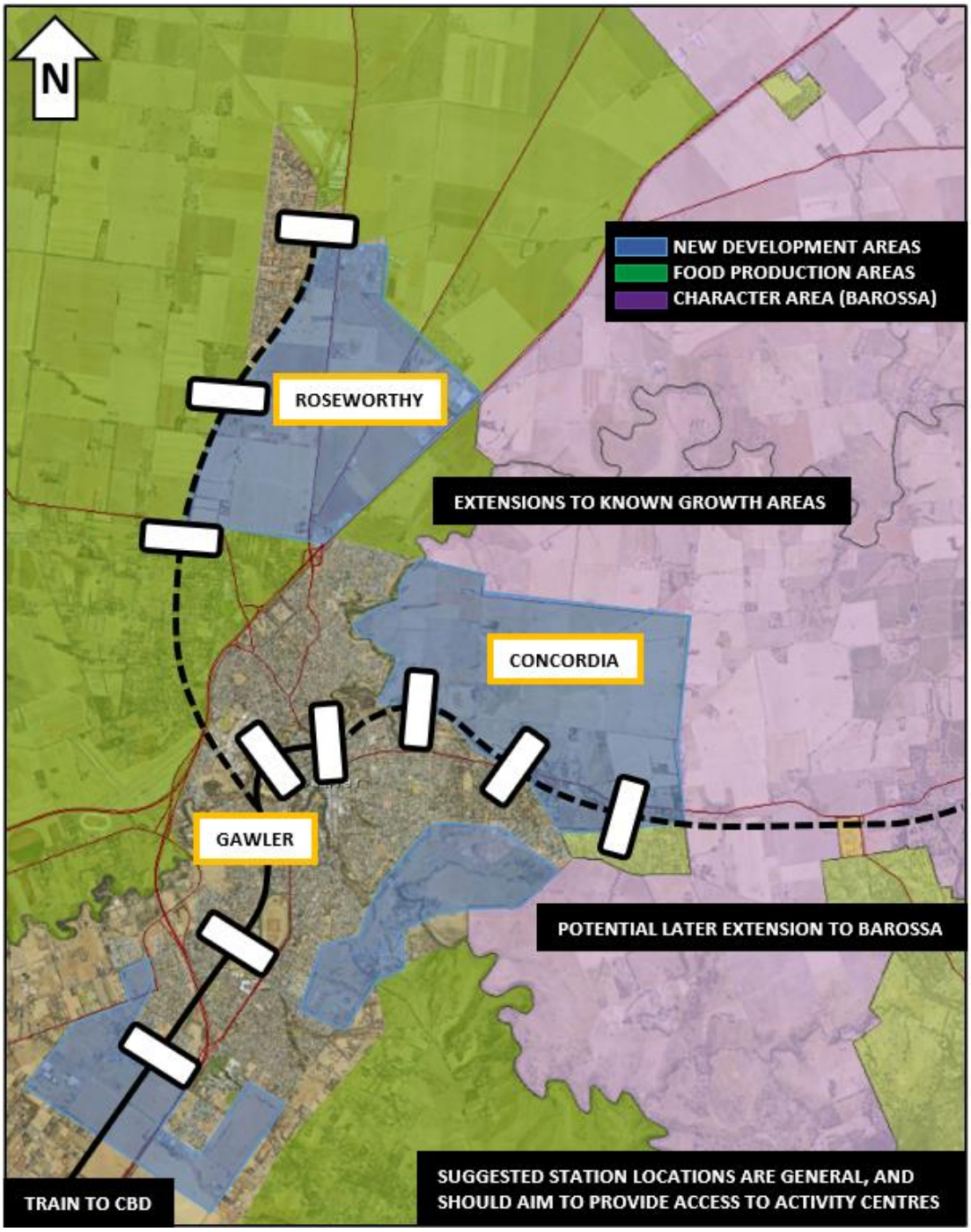

Figure 4: *Gawler, Roseworthy, Concordia* (Map adapted from SAPPA)

5.2.3 Lyndoch, Tanunda, Nuriootpa, Angaston (Figure 5)

The current population in this area is approximately 24,800. Capacity for up to 1,600 new dwellings or 3,800 new residents is contemplated in the 2020 Land Supply Report for Greater Adelaide.

Existing disused railways run through the Barossa as far as Nuriootpa. These lines could potentially be reactivated as-is, or may benefit from some localised alignment improvements to increase the line speed and reduce the number of road crossings required.

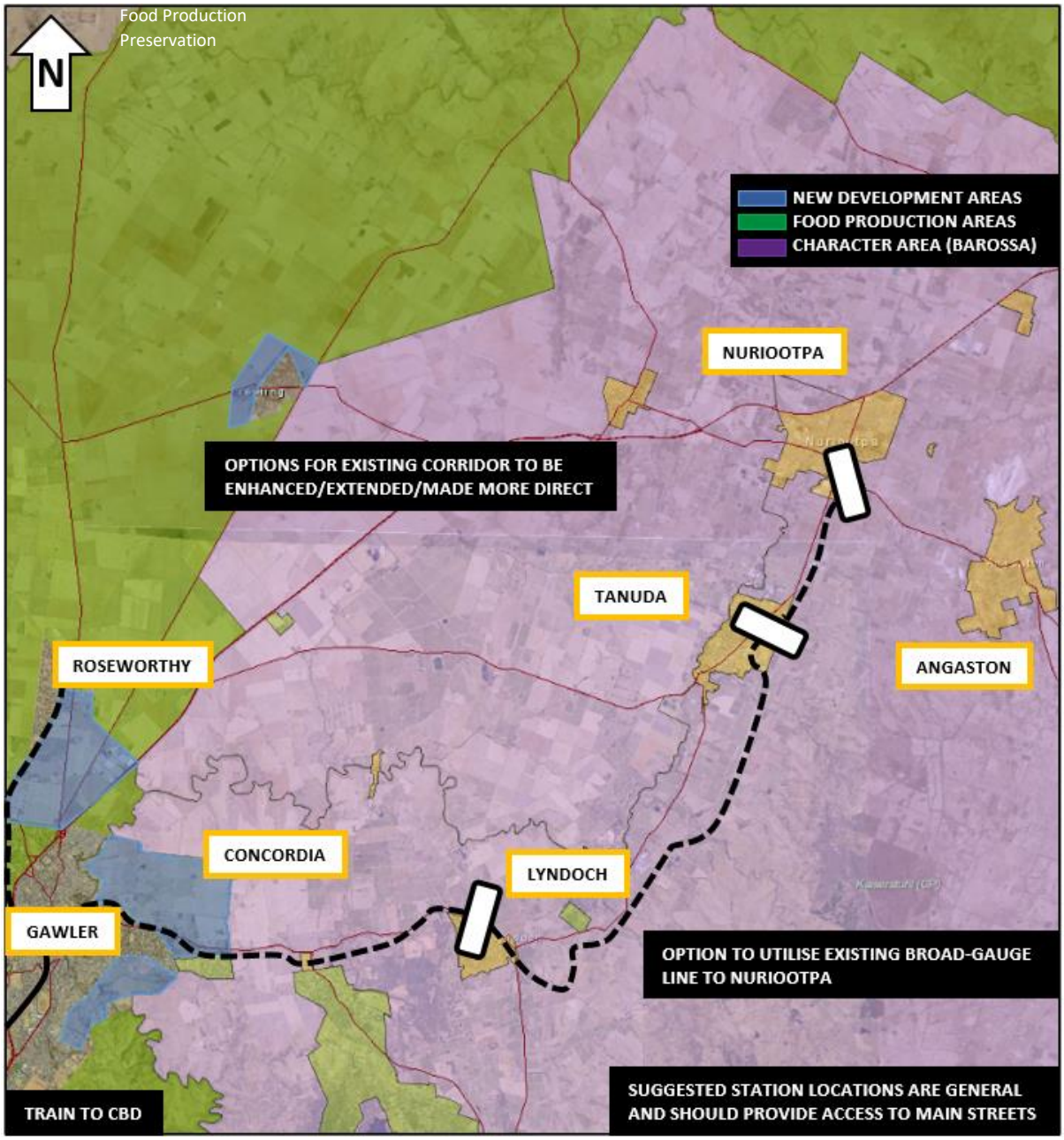

Figure 5: Beyond *Gawler, The Barossa via Concordia* (Map adapted from SAPPA)

5.2.4 Outer Northern Suburbs to LeFevre Peninsula Public Transport for AUKUS Employees

The possibility of providing public transport between outer northern suburbs and the Le Fevre Peninsula in conjunction with the AUKUS Project needs to be investigated. A high frequency bus services could be trialled in the first instance – possibly connecting from the Gawler Railway Line at Dry Creek, Mawson Lakes or Salisbury to the Peninsula. If the service was well patronised, consideration could be given to reinstating passenger rail services between Dry Creek and Port Adelaide.

5.3 Southern Heavy Rail

5.3.1 Adelaide Hills

The current hills population is approximately 80,000. Approximately 50,000 people live along the rail corridor through Aldgate/Stirling, Hahndorf, Nairn, and Mt Barker. The 2020 Land Supply Report for Greater Adelaide contemplates capacity for up to 7,500 new dwellings or 17,000 new residents contemplated in these towns. Growing traffic congestion in the Belair, Blackwood, Eden Hills, and Craigburn Farm areas, competition between cars, bikes, and buses on main roads along with problems associated with road widening means public transport operating on its own right of way makes rail an important future option.

Undertaking a trial of both standard and variable gauge passenger rail to Mount Barker is a priority within this term of Government. Several studies have emphasised the complexity and challenges of serving the growing Adelaide Hills community with quality public transport. Verifying baseline travel times utilising existing rail infrastructure is the essential next step.

Modest, inexpensive modifications to rolling stock and rail infrastructure could be prioritised in the first instance to enable a comprehensive operational trial.[35] Patronage and operational options will take time to fully understand, TAN is recommending a two-year trial of passenger services once initial operational trials have been undertaken.

A reinstated rail service can serve residents travelling both to the CBD and between major townships in the Hills. When combined with an Underground CBD loop, Mt Barker residents would have significantly greater access across the metropolitan area.

Long-term investments into the Adelaide Hills rail network could benefit passenger rail, freight, and The Overland, and could lead to passenger services being expanded along the Adelaide-Melbourne corridor, such as to Murray Bridge.

Investment in Adelaide Hills rail can also address the critical issues of air pollution, road safety and traffic congestion in Hills townships as well as on Glen Osmond Road, Cross Road, Portrush and Hampstead Roads, and the South Eastern Freeway.

Evidence given to the Select Committee on Public and Active Transport indicates that the issues identified in the Infrastructure SA 2022 report *Mount Barker Mass Transit* can be addressed.[36] Along with the initial trial, TAN recommends a comprehensive analysis of long-term rail options to Mount Barker inclusive of scenarios assuming the construction of an Adelaide Hills Freight Rail Bypass, and the subsequent conversion of dual passenger tracks between Adelaide and Belair to a unified gauge.

Upgraded bus services (already proposed) and bus priority lanes including the possibility of tidal flow, remain important irrespective of the train trial - especially along the South Eastern Freeway and Glen Osmond Road. It is understood that bus services are particularly badly affected by congestion along Glen Osmond Road at peak times.

5.3.2 Seaford Line Extension (Figure 6)

The current population between Seaford Station and Sellicks Beach is approximately 28,000. A further 11,000 people reside in McLaren Vale and Willunga with capacity for up to 9,000 new dwellings or 20,700 new residents contemplated in these towns in the 2020 Land Supply Report for Greater Adelaide.

Extending the Seaford Line south is a priority given the significant development occurring in Aldinga and proposed future development at Sellicks Beach. The rail extension will provide rapid transit between Seaford and Aldinga and should integrate with existing bus and bike routes in the area.

The State Government is to be congratulated on securing the rail corridor to Aldinga. It is imperative that they now move to secure a corridor through to Sellicks.

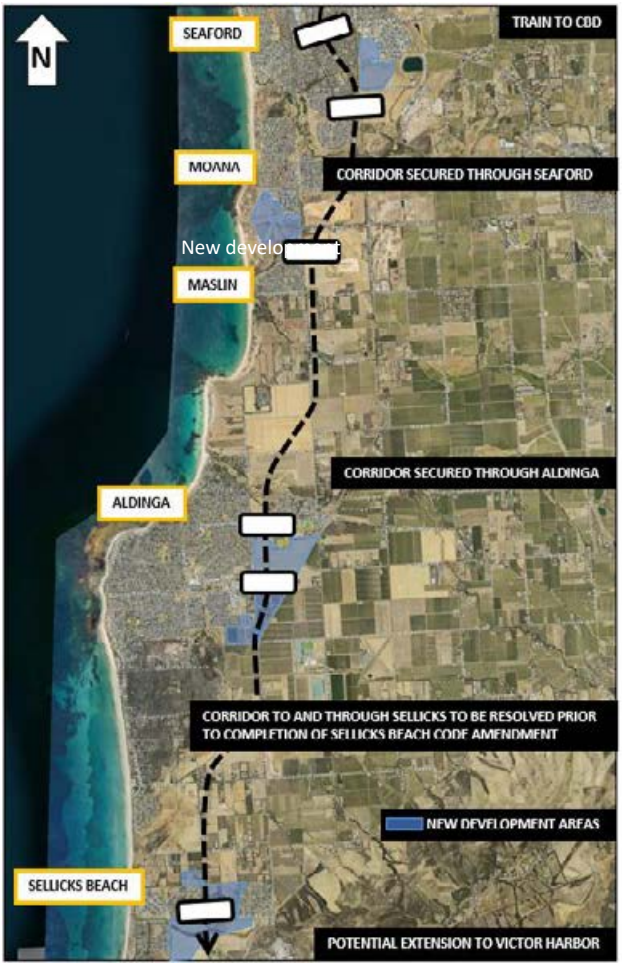

Figure 6: *Extension of the Seaford Line, Aldinga, Sellicks Beach and beyond*(Map adapted from SAPPA)

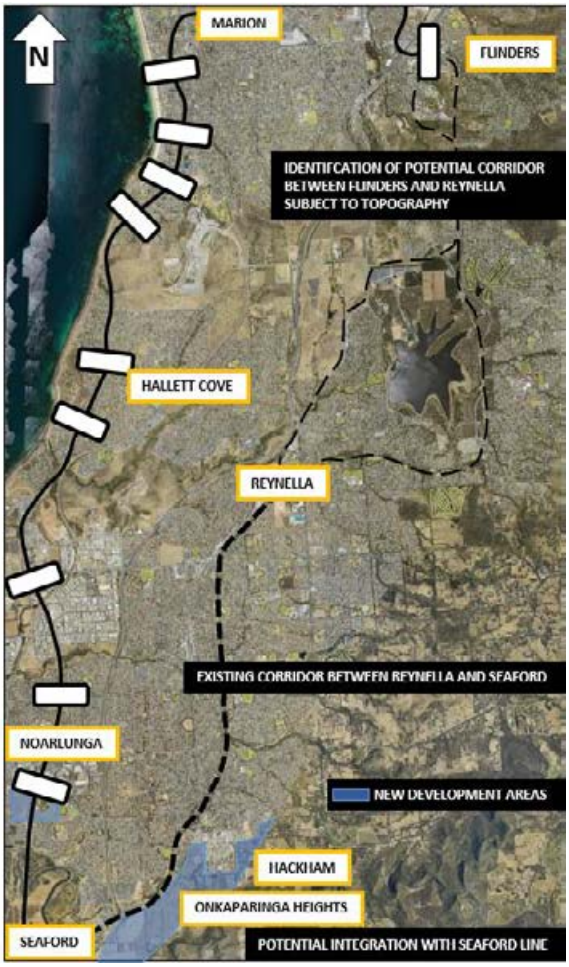

Figure 7: *Investigation into extending the Flinders Line/Reactivation of Willunga Rail Corridor* (Map adapted from SAPPA)

Photo 4: Heavy rail, Seaford, South Australia (Tom Wilson)

5.3.3 Victor Harbor to Goolwa

Current Population 28,500 - capacity for up to 14,000 new dwellings or 32,000 new residents contemplated in the 2020 Land Supply Report for Greater Adelaide.

Planning for the rail extension to Aldinga and beyond to Sellicks must consider the identification and reservation of a corridor for a longer-term extension to Victor Harbor via Sellicks Hill and Hindmarsh Valley. Such a route would be substantially more direct than the old route via Strathalbyn and likely competitive with road travel time.

Provision should also be made in the near future for:

- Regular public transport (buses) from the rail head (whether Seaford or Aldinga) to and within Victor Harbor through to Goolwa.
- Regular public transport along the coast between Victor Harbor and Goolwa.
- Consideration that the above services are provided by Adelaide Metro.

5.3.4 Flinders Line Extension (Figure 7)

The former Willunga railway south of Old Reynella serviced many inland suburbs. The reactivation of the Willunga rail line alignment could be achieved by:

- extending the Flinders Line over or through the escarpment to Old Reynella, then re-joining the original rail corridor south of Old Reynella and as far as Onkaparinga Heights, potentially re-joining the Seaford Line near Seaford Meadows.

The potential route south of Flinders has not been more seriously considered due to the substantial assumed cost of earthworks or tunnelling involved. TAN recommends that a study of a potential route designed for modern lightweight rolling stock be carried out, and that the rail corridor south of Old Reynella be retained for potential future use of such a railway.

6. Re-considering Light Rail/Tram

TAN supports the objectives of the previous AdeLINK plan and recommends the continued investigation of introducing segregated tram and light rail routes on sufficiently wide streets (e.g. CBD, North Adelaide) and where there are existing strategic corridors (e.g. Airport via Keswick Creek).

Light rail's greatest attribute is its adaptability; being able to seamlessly transition from a dedicated corridor to a mixed-street environment, enabling the deployment of light rail directly into commercial centres, high patronage areas, and through otherwise impermeable urban fabric. Whilst dedicated corridors for light rail are preferable where possible, the limited deployment of light-rail into mixed-traffic environments should be seen as a valuable tool to enable enhanced public transport in circumstances where it would otherwise not be feasible (as it currently does in Glenelg). Improving tram technologies that permit a combination of power sources negates the need for an entire route to be serviced by catenary wires. This allows a wireless light-rail solution in a variety of locations, such as through Grange Golf Course, Port Adelaide or along Semaphore Road.

Developments in trackless tram technologies are promising although they will be challenging to integrate into conventional tram networks. It is important to monitor trials currently taking place in other cities.

6.1 Adelaide Airport and Inner-West (Figure 8)

Adelaide Airport currently generates ~50,000 vehicle trips per day. Accommodating just 20% of these trips (10,000) on light rail would be equivalent to the combined patronage of the Outer Harbour and Grange lines and it would significantly reduce local congestion. Importantly, daily trips to the airport are projected to grow to 126,000 by 2039. This growth will substantially increase congestion in the inner west without a high-quality public transport solution.

Existing bus services facilitate only around 1% of trips to and from the Adelaide Airport (despite also being patronised for their local connectivity exclusive of Adelaide Airport) and it is proposed that a light-rail service along a dedicated corridor would offer a more intuitive, attractive, dependable, comfortable (incl. with baggage) and better integrated service which would drive substantially greater patronage.

In light of challenges of delivering such a service along Henley Beach Road or Sir Donald Bradman Drive, TAN proposes that consideration is given to an alternate route which branches from the existing Hindmarsh line in the vicinity of the new Women's and Children's hospital, travels over Henley Beach Road to connect with James Congdon Drive, crosses South Road in the vicinity of an already proposed signalised intersection and travels along the existing Keswick Creek alignment, which could potentially be upgraded in the process.

A high-quality, high-frequency, light-rail connection between Adelaide Airport and the CBD would offer a convenient, comfortable, highly prominent, and highly-patronised service for tourists, business travellers, international students, as well as western suburbs locals.

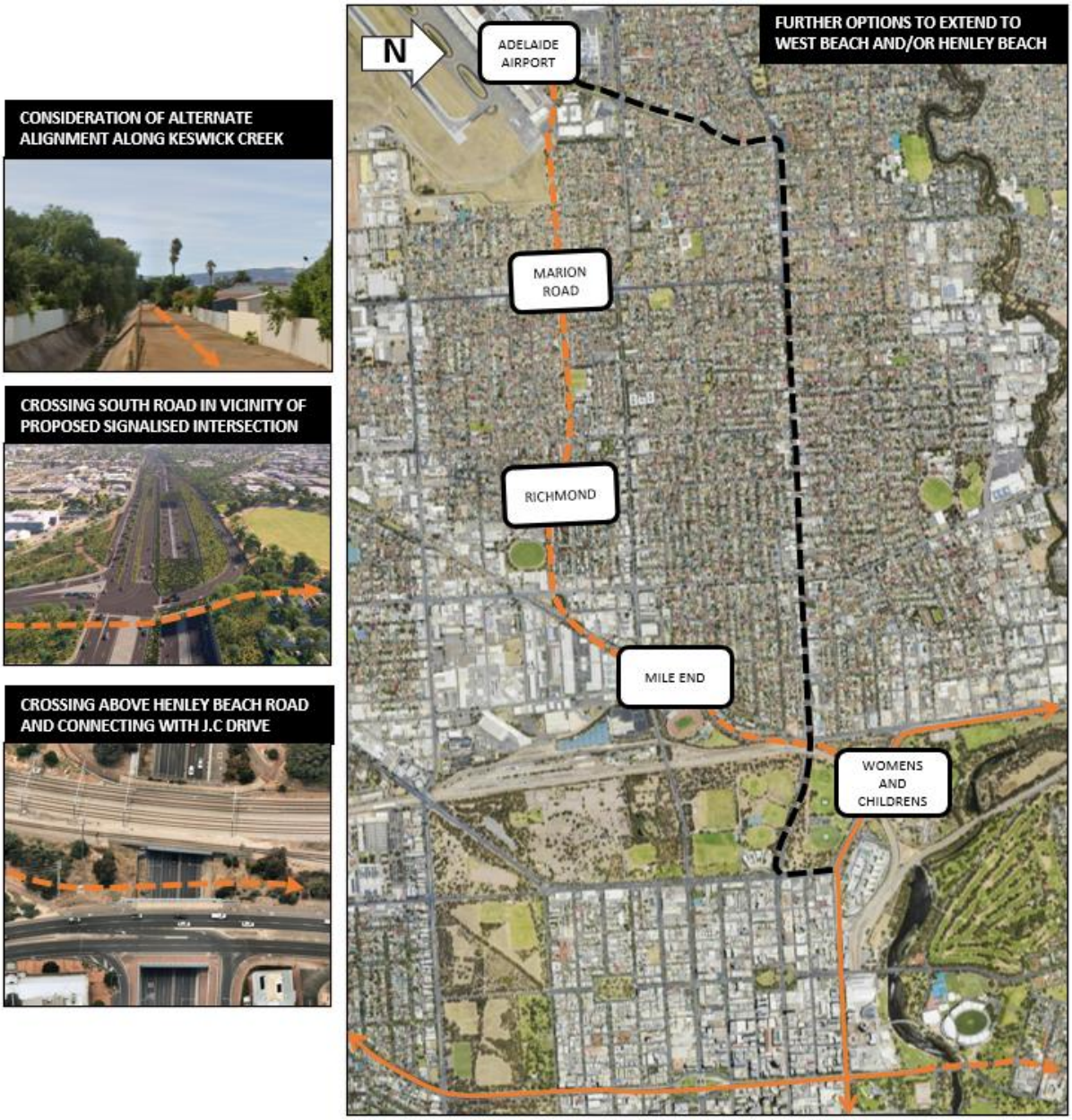

Figure 8: *Adelaide Airport and Inner West - Connecting to North Terrace and New WCH/RAH (Map adapted from SAPPA)*

6.2 North Adelaide and Beyond (Figure 1)

Review the future of the Festival Plaza tramline. Investigations should include extensions to:

- Adelaide Oval
- North Adelaide – O'Connell Street
- North Adelaide – near Aquatic Centre
- Blair Athol via Prospect Road
- Gepps Cross via Main North Road
- Ovingham Station to better serve the Aquatic Centre and link the Gawler Line with North Adelaide.

6.3 Northwest – Outer Harbor and Grange (Figure 9)

TAN is aware that the Government is engaging a consultant to advise on the replacement of the remaining 3000 Class diesel electric rail cars used on the Outer Harbor, Grange, and Belair lines. The investigation into vehicle propulsion is an ideal time to review and improve the routes and services operated.

TAN recommends a thorough investigation of replacing heavy rail with light rail on the Outer Harbor and Grange lines. This should be completed before further work on the heavy rail spur to Port Adelaide is completed to ensure future compatibility. TAN suggests replacing trains with light-rail on the Outer Harbor and Grange Lines would be ideal, regardless of their power source, as light rail is likely to have the following **unique benefits**:

- Potential for improved rail access throughout the port centre and across the port area by including the new Port Spur as part of the light rail conversion and extending the line along St Vincent Street, potentially rejoining the existing rail route at Glanville. Alternatively, the light rail could divert from the existing line near the Commercial Road Station (but at ground level) and operate along both Commercial Road and St Vincent Street. Either of these routes will improve access into the port centre from LeFevre Peninsula.
- Potential for improved rail access to Grange Jetty and Esplanade (similar to Glenelg) by running on-street in Grange through to a new terminus in this location.
- Potential for the return of rail to Semaphore, by branching from the Outer Harbor via Port service at Glanville.
- Flexibility to divert or extend from the existing rail corridor into mixed traffic environments allows greater permeability into the areas being served, and potential to generate additional value out of the existing rail corridor.

- Full integration with the existing CBD tram network, with options to connect into existing Hindmarsh Terminus, as well as into King William Terminus via Adelaide Oval.
- There is some concern with replacing heavy rail with light rail with regards to speed, comfort, and capacity, so it is important to consider the following:
- Trams are currently available that are suited to longer distances, higher speeds and greater comfort – many trams around the world operate at greater average speeds than the current Outer Harbour line. Unlike trains, it is common practice for trams to bypass stops where there are no passengers wishing to board or alight.
- It will be possible to run a combination of all-stop and express services and ensure options for service transfers at key stations.
- Additional travel time through limited sections of on-street running (Grange, Port, Semaphore) would in those instances be balanced by more direct passenger access to those destinations, and would not negatively impact the speed of the services otherwise.

The current Outer Harbour and Grange services accommodate about 10,000 passengers per day. Some tramlines in Melbourne carry up to 40,000 per day.

Figure 9: *Conversion of Outer Harbour and Grange Lines to Light Rail, extensions in Grange, Port Adelaide and Semaphore, full integration with existing CBD tram network.* (Map adapted from SAPPA)

6.4 Southeast

A successful trial of the Mt Barker rail line could lead to an investigation of a modern interchange (incorporating the existing heritage building) at Mitcham Station where passengers can seamlessly transfer to buses or trams for travel to non-CBD destinations.

7. Buses

A comprehensive review is required of the Adelaide bus network that includes access to and conditions at stops and interchanges. It must be followed up with ongoing evaluations of the network to ensure changes are meeting the needs of passengers and growing patronage. Local residents are best placed to identify service improvements. That said, we propose the following recommendations based on discussions with local politicians and members of the community.

- Improve transfers and ensure seamless integration with rail and tram services, for example by buses and trams sharing the same platforms (e.g., across the platform transfer) where possible, provide weather protection for transferring passengers and do not require passengers to transfer across roads.
- Increase safety for public transport passengers both on services and around stops and interchanges, particularly at night.
- Go Zones
    - Increase frequencies and limited-stop arrangements along existing and new or extended Go Zone bus routes. New Go Zone bus routes could include Sixth Avenue (St Peters), Fullarton Road, Main South Road, and Beach Road (to Noarlunga Centre).
    - Extend operational times of Go Zones into evenings and weekends - particularly on roads with high levels of activity and/or to large activity centres such as along Port Road, Torrens Road, Churchill Road, Prospect Road, Main North Road (to Gepps Cross), Hampstead Road (not only to Lights View but also to Ingle Farm), North-East Road, Payneham Road, The Parade, Glen Osmond Road, Unley Road (to Mitcham), King William Road, Goodwood Road, and Henley Beach Road (to Henley Beach).
    - Progressively implement peak hour bus priority lanes on arterial roads, e.g., Anzac Hwy, Golden Grove Road.
- Combined City of Adelaide and State Government Concept Plan for Currie / Grenfell Street High Frequency Bus Corridor, to identify long-term opportunities to improve accessibility, weather protection and on-street amenity for bus users. Investigate the potential inclusion of an east-west bike route.
- Provide traffic signals that prioritise buses at locations where buses have difficulty making right turns, or where the bus route must change from its normal route at peak times, or buses have to follow an extended, inconsistent and inconvenient route (e.g., Grant Avenue / Portrush Road, Dulwich Avenue / Fullarton Road, and Dunrobin Road / Brighton Road).
- Investigate key routes for increasing bus frequencies especially at night and on weekends. This improvement could be expanded to more services over time.

- Improve inter-suburban access, particularly between outer suburban and peri-urban centres. For example:
    - extend O-Bahn services into new suburbs to be developed north of Greenwith and Golden Grove,
    - improve bus links from Golden Grove to Mawson Lakes, Salisbury, Elizabeth, and Lyell McEwan hospital,
    - improve east-west link between Two Wells and Riverlea to Salisbury, Elizabeth and Gawler,
    - introduce an Adelaide Metro bus service to operate between Tea Tree Plaza, Lobethal, Mount Pleasant and Springton, including associated school bus services (including links from Mount Pleasant to the Barossa Valley),
    - extend the Adelaide Metro area to include Mannum, Murray Bridge and Strathalbyn, and operate normal bus and school bus services in that area as Adelaide Metro services (thus avoiding the double-ticketing system on buses in the area), and
    - extend the Adelaide Metro area to include Goolwa and Victor Harbor, and operate normal bus and school bus services in that area as Adelaide Metro services.
    -
- Improve public knowledge of the bus network with easily available hard copy (such as pocket maps as in many other cities) and digital information. Re-establish at least a small public transport information service near the heart of the bus network which is located at King William and Grenfell/Currie Streets. Provide signage including maps and timetables at all high-use public transport stops and stations. Many passengers do not or cannot use digital information.
- Improve wayfinding to bus stops (tram stops/train stations) with design cues and signage.
- Increase funding to local governments to ensure walkability to local bus stops and interchanges. For example, by addressing the backlog of footpath maintenance, up-grading and widening footpaths within public transport catchments, improving legibility of walking routes, cycling/micro-mobility routes and greening/tree planting of verges.
- Provision and funding of bus shelters should not be left to advertisers or local governments. The Department for Infrastructure and Transport needs to take a greater role in providing shelters and on-time service information.
- Provide safe routes and secure bicycle/PMD facilities at major public transport stops and stations – with bike hire/repair services at the largest centres.

Localities identified in the Planning and Design Code for high concentrations of activity and intensive development such as the Urban Boulevard, Urban Corridor, Township Mainstreet, Suburban Activity Centre and Business Neighbourhoods zones should be prioritised for high frequency public transport services.

Photo 5: Bus-rail interchange, Smithfield, South Australia (Tom Wilson)

8. A Fairer Fare System

Adelaide Metro's exclusively tap-on fare system is simple in operation, but leads to fare inflexibility which may constrain the effective growth of the public transport network in the long term.

8.1 Short Distance Fares

TAN suggests the current fare structure discourages short-distance trips, with passengers travelling locally (such as from Seaford to Noarlunga) charged the same fare as passengers commuting to the CBD (such as from Seaford to Adelaide).

The short distance fare structure could better incentivise living locally in a variety of ways; through reintroduction of the two-section fare, or through introduction of a tap-off system with reduced fares for limited distance travel or travel which does not end in the CBD.

8.2 Long Distance Fares

TAN acknowledges that substantial expansion of the suburban rail network to the extent described in this submission would take many years. It is important that in the interim, public transport patronage in the commuter belt beyond the Adelaide Metro area is encouraged by supporting measures that will lower costs and deliver more frequent services.

TAN proposes that the Adelaide Metro ticketing system and more frequent, integrated services, should be progressively provided as far out as Two Wells, the Barossa, Mannum, Murray Bridge, Strathalbyn, Goolwa, Victor Harbor and Normanville. Currently, many of these towns have only limited services operated by Link SA.

TAN proposes that an immediate improvement would be to equip Link SA buses with Adelaide Metro readers, which could either charge the full applicable fare, or could be utilised purely as a free tap-off function that enables free interchange with Adelaide Metro services.

TAN does not expect typical Adelaide Metro service frequencies to be provided initially to all regional towns within Greater Adelaide, but rather that existing service frequencies are supported and increased to encourage progressively greater patronage until expansion of Adelaide Metro services is warranted.

8.3 Emerging Opportunities

Mobility as a Service (MaaS) models provide an opportunity for Adelaide Metro to work with micro-mobility and share vehicle providers to expand the reach, patronage and return on investment of the public transport network. MaaS and other share vehicle providers (e.g., cargo-bike share, local community initiatives) can be integrated into mixed use developments at train stations and interchanges.

9. Public Transport: Meeting the Challenges

It is inconceivable that our major land use, transport, and infrastructure agencies are not planning for major improvements and investments in public transport infrastructure and services over the next 20 years. Perth, Brisbane, Sydney, and Melbourne have made and/or are making substantial investments in public transport infrastructure and services. These are the Capitals that have grown at a significantly greater rate than Adelaide (and Hobart) over the past 50 years.

The challenges we face in terms of environmental sustainability, equity within and across generations, housing supply and affordable living, aging of the population, personal health, amenity, liveability, attracting industry investment, and retaining a skilled workforce all demand a sophisticated approach to transport. TAN's *Greater Adelaide Public Transport: A Network for 21st Century Challenges* provides a strong starting point for our key agencies to review, plan for, and invest in a quality public transport network that will set us on the right track into the second half of this Century.

Transport Action Network

The Transport Action Network (TAN) comprises community organisations, active and public transport advocacy groups, urban and transport planners, practitioners, and researchers concerned for the future of sustainable transport and land use integration in South Australia.

Acknowledgement

The authors would like to acknowledge the significant contribution made by TAN network members in creating the *Public Transport Discussion Paper* and this follow up position paper *Greater Adelaide Public Transport: A Network for 21st Century Challenges*.

[1] In 2016/17, the reporting term shifted from 'initial boardings' to patronage and it is unclear whether 'patronage' refers to combined initial AND transfer boardings.
[2] For example: Adelaide Plains Council (nd) *Adelaide Plains Council Strategic Plan 2020-2024*; Mount Barker District Council (nd) *Integrated Transport Plan Lead Strategy*; Town of Gawler (nd) *Gawler Community Plan 2017-2027*; City of Victor Harbor (nd) *Community Plan 2030*.
[3] DCCEEW (2022) Australia's Emissions Projections - 2022. Canberra, Page 9: DCCEEW; DCCEEW (2023) National Electric Vehicle Strategy. Canberra: DCCEEW
[4] DCCEEW (2022), Page 10.
[5] Excluding cars and SUVs used as commercial vehicles.
[6] DEW (2021). Report on the operation of the *Climate Change and Greenhouse Emissions Reduction Act 2007* (South Australia); DEM (2023) South Australia's Green Paper on the Energy Transition. Adelaide: Government of South Australia. Based on DCCEW (2022, p. 37) figures indicating passenger vehicles accounted for 45% of emissions in 2019. This figure excludes cars and SUVs used for commercial purposes (LCVs). LCVs and passenger vehicles combined account for 62% of South Australia's GHG emissions or 3.9Mt.
[7] Assuming the South Australian fleet growth rate is in line with the national rate. BITRE (2023) Identified a national growth in the passenger fleet of 1.8% from 2022-2023 (Page 5). This is consistent with average growth over the previous decade of 1.7% or 19,720 vehicles per year (BITRE 2022, Table 6.9b).
[8] DCCEEW (2023). Page 2.
[9] DCCEEW (2022). Page 39. This figure is at odds with the South Australian Department of Energy Mining Figure which used a 2020 forecast of 40% of vehicle sales being BEV or PHEV by 2030. DEM (2023) South Australia's Green Paper on the Energy Transition, DEM: Adelaide.
[10] New car sales for 2022 were 1,081,429 vehicles (Australian Automotive Dealer Association - https://www.aada.asn.au/bulletins/2023/01/06/2022-new-car-sales-results-released/). Assuming South Australia's share of Australian new vehicle sales remains at 6% (based on BITRE new vehicle sales by State for 2017-18 – the latest available). The share of new car and SUV sales for 2022 is just under 65,000 vehicles. Assuming this rate remains for the foreseeable future, it would take until 2050 to reach a car fleet with net zero operational emissions.
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[22] E.g., Infrastructure Australia (2019) Urban Transport Crowding and Congestion. Infrastructure Australia: Canberra; BITRE (2023*) Freight Vehicle Congestion in Australia's Five Major Cities – 2022*. Australian Government: Canberra.
[23] See the systematic review of studies in Bucsky, P., & Juhász, M. (2022). Long-term evidence on induced traffic: A case study on the relationship between road traffic and capacity of Budapest bridges. *Transportation research part A: policy and practice*, *157*, 244-257.
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[34] Infrastructure SA (2020) *20 Year State Infrastructure Strategy*. Infrastructure SA: Adelaide p. 125
[35] See for example, Rod Hook & Associates (2021) *Rail Public Transport Options for Mt Barker and the Adelaide Hills*.
[36] See transcripts of hearings and submissions to the Select Committee on Public and Active Transport from Gary Field, Mt Barker Residents Association, South Australian Transport Action Group. For broader support of the rail network see the submission from the Transport Australia Society. District Council of Mt Barker has questioned the scope of the Infrastructure SA report and is calling for detailed, comprehensive investigation of rail options to Mt Barker.

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 2:07 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: UniSA-STEM-and-Creative-Academic-Units-collective-commentary-6-nov.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Other
Given name:	Debbie
Family name:	Frisby
Organisation:	UniSA
Email address:	[redacted]
Phone number:	[redacted]
Comments:	This submission is a collective of comments from a group of academics and students across a number of disciplines: UniSA STEM and Creative Academic Units collective commentary Collective commentary of a groups of academics from UniSA: Dr Johannes Pieters: Program Director, Urban and Regional Planning, UniSA Creative Debbie Frisby: Program Director, Construction Management, UniSA STEM Dr Chris Brisbin: Program Director, Architecture UniSA Creative Shadi Shayan: Course Coordinator, Construction Management, UniSA STEM Dr Andrew Allan: Senior Lecturer, Urban and Regional Planning, UniSA Creative Sonali Pandithawatta: Course Coordinator, Construction Management, UniSA STEM Dr Sadasivam Karuppannan: Senior Lecturer Urban and Regional Planning UniSA Creative Dr Shokry Abdelaal: Program Facilitator: UniSA Online, Green Building Council Australia Undergraduate student: Bachelor of Construction Management (Honours)
Attachment 1:	UniSA-STEM-and-Creative-Academic-Units-collective-commentary-6-nov.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 20.8 KB
Attachment 2:	No file uploaded
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

UniSA STEM and Creative Academic Units collective commentary

Collective commentary of a groups of academics from UniSA:

Dr Johannes Pieters: Program Director, Urban and Regional Planning, UniSA Creative

Debbie Frisby: Program Director, Construction Management, UniSA STEM

Dr Chris Brisbin: Program Director, Architecture UniSA Creative

Shadi Shayan: Course Coordinator, Construction Management, UniSA STEM

Dr Andrew Allan: Senior Lecturer, Urban and Regional Planning, UniSA Creative

Sonali Pandithawatta: Course Coordinator, Construction Management, UniSA STEM

Dr Sadasivam Karuppannan: Senior Lecturer Urban and Regional Planning UniSA Creative

Dr Shokry Abdelaal: Program Facilitator: UniSA Online, Green Building Council Australia

Undergraduate student: Bachelor of Construction Management (Honours)

We acknowledge that the discussion paper is a high-level vision for the development of the Regional Plan for Greater Adelaide and we look forward to reviewing a draft plan in 2024.

We would like to offer our views on the paper's insights into impacts on future land use decisions.

These views were developed through a workshop involving participants from the disciplines of Urban and Regional Planning, Architecture and Construction, Sustainability and SMART technologies. We did not set out to comprehensively respond to the questions in the Discussion Paper but rather to provide reflections and potential directions for further evidenced based consideration in the development of the GARP regarding guiding principles, major trends and drivers identified, and the four outcomes for Greater Adelaide.

1. A greater choice of housing in the right places

The discussion paper suggests that decentralization and greenfield development as land use policies will be part of the solution to the housing affordability crisis. Greenfield developments are often brought to market as master planned communities but, as the Discussion Paper suggests, short term advantages regarding housing affordability and access to social infrastructure (assuming it is delivered on time) can soon be overshadowed by recurrent costs associated with car dependency. The purported self-sufficiency associated with master planned communities looks attractive to many people in regional communities who see themselves as living in areas that are less self-sufficient in nature. Recent research prepared for Infrastructure Victoria has identified the extent to which residents are prepared to make trade offs regarding location and these findings may be of interest https://www.infrastructurevictoria.com.au/wp-content/uploads/2023/03/Wallis-Influencing-greenfield-housing-demand-qualitative-research-final-technical-report.pdf

We expect that the measures required to achieve a greater choice in housing will involve decisions regarding the degree of density and housing typologies, and the interplay of the two. In the case of

development along transport corridors it will be important to understand the resulting social, cultural, and economic value of those developments based on type. UniSA academic, Dr Damian Madigan has explored alternative ideas for infill rather than adding more housing or increasing the amount of residential units. His work suggests that infill development is deeply connected to the idea of social cohesion (see https://www.madigan-architecture.com/portfolio/alternative-infill/) .

2. A greener, wilder and climate resilient environment.

Research has been carried out at UniSA on the measurement of green space, the existing models for measurement and distribution and the relationship between green space and health, and we anticipate this data could inform the Greater Regional Plan (see https://www.researchgate.net/publication/297279943_Validating_and_measuring_public_open_space_is_not_a_walk_in_the_park).

You may be aware that Green Star Communities Version 2 is currently in development and deals in part with nature and biodiversity. This work is highlighting the challenge of scalability and identification of quantifiable indicators regarding the evaluation of potential development.

3. Employment trends

The Broad Industry Categories of Traditional, Freight and Logistics, Knowledge Intensive and Population Serving Uses used in the Discussion Paper provides a sound framework for analysing demand for employment lands. As the Discussion Paper suggests, weekly journey to work patterns have been disrupted, perhaps permanently, by Covid 19 public health work from home measures reinforced by enabling technology. This disruption may create a space for further shifts in work/home regimes such as the four-day week.

4. Socially cohesive places

We note the move from the principles of social inclusion and fairness in the current plan to *equity and social cohesion* in the Discussion Paper. We suggest that that the term social cohesion be defined and any overlaps with terms such as social interaction, social capital and social connectedness be clarified (see Mouratidis and Pootingo 2020). In particular we suggest that it would be helpful to understand how the GARP sees social cohesion being supported at street, neighbourhood, metropolitan and city level so that potential solutions through strategic spatial planning can be flagged.

5. Living Locally.

Recent research has shown that approx. 8% of the population of metro Adelaide reside in a 20 minute neighbourhood when access to healthy food, recreational resources, community resources, public open space and public transport were used to operationalize the concept (Thorton et al 2022) This level of access was associated with a dwelling density of 1440 dwellings per square kilometre. We agree that density of development will be important to the success of “living locally” however a transition to this urban form will no doubt require considerable co-design in order to achieve outcomes such as a better job to housing ratio.

6 Public Engagement

We acknowledge that the Planning, Development and Infrastructure Act (2016) includes a Community Engagement Charter, and that global trends continue to develop and promote public engagement, participatory budgeting processes and participatory decision making.

7 Cost, affordability and outcomes

The Discussion Paper provides comparative data on the cost of bringing build ready land to the market and we note and recommend the work of SGS Economics and Planning on this topic (https://www.infrastructurevictoria.com.au/wp-content/uploads/2019/04/SGS-Economics-and-Planning-Comparative-costs-of-infrastructure-across-different-development-settings.pdf)

We endorse the view that the provision of appropriate infrastructure including health care, education, internet infrastructure networks for both greenfield and infill sites will have significant impact on cost which will differ for types of development. Transport infrastructure policy will be informed by diversification of transportation modes such as electric vehicles, autonomous vehicles, electrified public transport modes; by greater emphasis on the health benefits of active transport and by working from home culture. These trends will impact civil infrastructure, investment and supply and the coordination of supply with urban planning. Planning for SMART technology for new development in greenfield areas specifically is reliant on good internet infrastructure. Continued research and development of SMART technologies will be vital contributors to effective and efficient infrastructure and a strong economy.

8 Strategic Planning Standards

In considering the questions in the Discussion Paper it was felt that in addition to participants making comments based on their experience within SA we also propose that it is fruitful to make reference to national standards regarding strategic planning. Consequently we recommend that the review of capital city strategic planning systems undertaken by the COAG Reform Council in 2011 be used to develop the GARP, specifically the list of criteria that the Council recommended should inform a capital city strategic plan (see https://www.linkplace.com.au/coag#:~:text=COAG%20asked%20the%20council%20to,and%20infrastructure%20in%20our%20cities.)

From:	PlanSA Submissions
To:	DTI:PlanSA Submissions
Subject:	Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Date:	Monday, 6 November 2023 4:57:54 PM
Attachments:	UDIA-GARP-Discussion-Paper-Submission.pdf UDIA-Grow-Reform-Build-2022.pdf UDIA-Planning-System-Implementation-Review-Final.pdf EFPA-Review_UDIA-Submission_Final_060821.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Advocacy Organisation
Given name:	Liam
Family name:	Golding
Organisation:	Urban Development Institute of Australia (SA Branch)
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Please find attached submission and appendices comprising the UDIA submission to the Greater Adelaide Regional Plan Discussion Paper.
Attachment 1:	UDIA-GARP-Discussion-Paper-Submission.pdf, type application/pdf, 306.5 KB
Attachment 2:	UDIA-Grow-Reform-Build-2022.pdf, type application/pdf, 7.2 MB
Attachment 3:	UDIA-Planning-System-Implementation-Review-Final.pdf, type application/pdf, 641.6 KB
Attachment 4:	EFPA-Review_UDIA-Submission_Final_060821.pdf, type application/pdf, 704.8 KB
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

UDIA Greater Adelaide Regional Plan Discussion Paper Submission

The Urban Development Institute of Australia South Australian Division (UDIA) acknowledges the extensive time and work that has gone into the preparation of the Greater Adelaide Regional Plan (GARP) Discussion Paper. The UDIA is pleased to provide this submission to support the drafting of the GARP.

This Discussion Paper has been released at a critical time in the State's history, which is in the midst of a housing affordability crisis. It has been regularly acknowledged that the solution to the crisis is to increase the supply of housing. State and Federal Government targets for housing construction over the short term aim to increase housing in South Australia by an annual amount well above our historical average. This is strongly supported by the UDIA.

The State Government also has an ambitious economic growth agenda featuring the creation of new and expansion of existing employment generating industries and transformational infrastructure builds. This agenda, combined with positive housing targets highlight the acute need to plan for the growth of the State. The UDIA supports a robust and well-informed growth strategy.

As the premier development industry representative body in South Australia for over 50 years, the UDIA has a strong history of advocacy and policy reform in the State. We see the following as critical areas for the GARP and provide relevant recommendations in the following sections:

1. Land Supply - Greenfield
2. Land Supply - Infill
3. Infrastructure
4. Skills shortage

We also highlight the need for an approach in a thirty-year plan that includes a longer-term vision for the Greater Adelaide Region past this time horizon. Delivery of housing along with supporting infrastructure and social planning has a lifespan beyond thirty years and it seems natural to assume that future growth will be required beyond the scope of the GARP and long into the future. Through robust forward planning, South Australia will be in the best position to retain residents and build on the State's already strong economy and liveability.

1. Land Supply – Greenfield Development

The solution to the current Housing Affordability Crisis we face (as freely acknowledged by Government) is to increase land supply.[1] Therefore, it is concerning to the development industry that there is such a strong assertion that there is currently a 15-year land supply and as such the Greater Adelaide Regional Plan review does not need to consider transformational changes.

[1] ABC News – 16 August 2023: https://www.abc.net.au/listen/programs/radionational-breakfast/sa-premier-national-cabinet-housing-supply-renting/102733254;
South Australian Government – 17 August 2023: https://www.premier.sa.gov.au/media-releases/news-items/sa-well-placed-to-capitalise-on-national-cabinet-housing-agreement

The UDIA remains committed to ensuring there is a pipeline of development-ready land and has concerns relating to inadequacies in existing land supply measurements. We have previously raised concerns in relation to how land supply is calculated. Whilst it is acknowledged some improvements have been made in this regard, the UDIA questions the accuracy within the Discussion Paper that
'15 years supply is currently available.' Whilst there may be land that is already zoned for residential development in Greater Adelaide, we understand that much of this land is not currently development-ready (i.e. does not have connection to critical infrastructure required to accommodate housing).

The UDIA remains concerned that the methodology used to determine land supply fails to factor in constraints and contingencies that limit land readiness. It is also critical that land supply is distributed across the region and not dependent on a small number of sub-regions, so that new home buyers are not forced to be displaced from their existing communities.

The UDIA is also concerned that the estimated land supply includes land which has servicing challenges, and is also skewed by the assumed supply to be delivered from single large estates (i.e. Riverlea, Dry Creek and Concordia). The reality is land which in essence is controlled by a single developer has a practical delivery constraint with projects of such a nature likely to take 20 years or more to deliver. The issue therefore is that the 15-year rolling land supply targets (in respect to actual land able to be delivered to the market) are not currently being met and will continue to not be met into the future. At present demand is outstripping supply and this is clearly demonstrated by rising housing prices and housing affordability falling to crisis levels.

In addition to land supply, the need for housing choices and diversity is greater now than ever before as evidenced by the data on changing household demographics. The GARP Discussion Paper projects a need to supply 300,000 new homes, a 46% increase in population as well as an anticipated 78% increase in single person households. The UDIA is concerned that without a proactive policy environment the required land supply to meet even these needs will not be met, let alone the land supply required following the announcement of new Federal Government housing supply targets.

Putting issues with land supply methodology aside for a moment, the housing supply targets within the GARP, independent of the land required to deliver them, appear to have already been superseded.

At National Cabinet in August, a target of 1.2 million homes to be built over the next 5 years was set as "*all governments recognise(d) the best way to ensure more Australians have a safe and affordable place to call home is to boost housing supply*."[2]

Based on South Australia's per capita share, the HIA has estimated this equates to 80,000 homes over that period, which will require construction of 16,000 new homes every year to meet that target. This compares to 300,000 new homes over 30 years in the GARP discussion paper, which equates to 10,000 new homes every year, indicating that even since the release of the GARP Discussion Paper there has been an increase in short term supply goals of over 50%.

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[2] Australian Government – 16 August 2023: https://www.pm.gov.au/media/meeting-national-cabinet-working-together-deliver-better-housing-outcomes

Historical averages of annual housing supply range between 9,000 and 12,000 homes per annum, comprised of a mix of detached houses, townhouses, and apartment developments. Detached homes make up the overwhelming majority of this supply, accounting for between 7,000 and 9,000 per annum over the last 30 years.

This means meeting the Federal Government target agreed at National Cabinet will require several thousand additional homes annually over what has been delivered in the past and an increase in delivery of housing beyond what is described as envisaged in the GARP Discussion Paper. In order for South Australia to deliver several thousand more homes (over and above historical averages and current rates) every year for each for the next 5 years to meet its share of the target, land will need to become available in far greater quantities - and in accelerated time frames - than what is currently envisaged.

To emphasise, the GARP forecasts South Australia will require 300,000 additional homes over the 30-year period. With 80,000 required in the first 5 years, clearly the GARP forecast will fall well short of what is required. It is an uncontroversial fact that there is nowhere near enough land available inside the Urban Growth Boundary, or proposed in the current GARP, to enable delivery of these homes.

This shows the need for the Government to have increased capacity to respond to trends, challenges, and opportunities via more frequent reviews. Previous UDIA submissions to Government have highlighted the requirement in Schedule 4(1) and section 7 of the *Planning, Development and Infrastructure Act (PDI)* 2016 that obliges the State Planning Commission to review land supply at least once every five (5) years. We believe the five-year review period is too infrequent.

Consistently the UDIA has asserted that land supply issues combined with changing economic circumstances have caused a housing affordability crisis and these factors make the timeframe for reviews more urgent. Land supply and “development ready” land reports do not adequately factor in critical delivery elements such as infrastructure delivery, approval process delays and the political decision-making process.

These issues were highlighted in the UDIA submission to the Expert Panel coordinating the Planning System Implementation Review (see Appendix B). These items have not been responded to at this time and addressing these issues will be critical to ensuring the GARP review produces outcomes that will support Adelaide’s growth over the next 30 years.

The GARP discussion paper highlights that the vast majority of growth areas for housing are identified in the ‘outer north’ of Greater Adelaide (Figure 1). The lack of a spatial distribution of land supply is highly problematic. The residential housing market in Adelaide is not homogenous and requires different product types, different geographic locations, and different price points to satisfy a cross-section of purchasers.

The Discussion Paper has earmarked the majority of greenfield land supply in the 'outer north' region and within ‘satellite cities’. Whilst greenfield development in these areas is encouraged, the UDIA questions the spatial distribution of land supply and housing across Greater Adelaide.

There appears to be no greenfield developments envisaged within the 'outer south' region beyond the land already rezoned at Hackham and Aldinga. In a High Growth scenario, it is likely there will be increased pressure on housing supply and affordability in the 'outer south' region. It is therefore sought that further development south of Aldinga and of Sellicks Beach and consideration of long-term supply (e.g. Bowering Hill) should be incorporated into the Greater Adelaide Regional Plan.

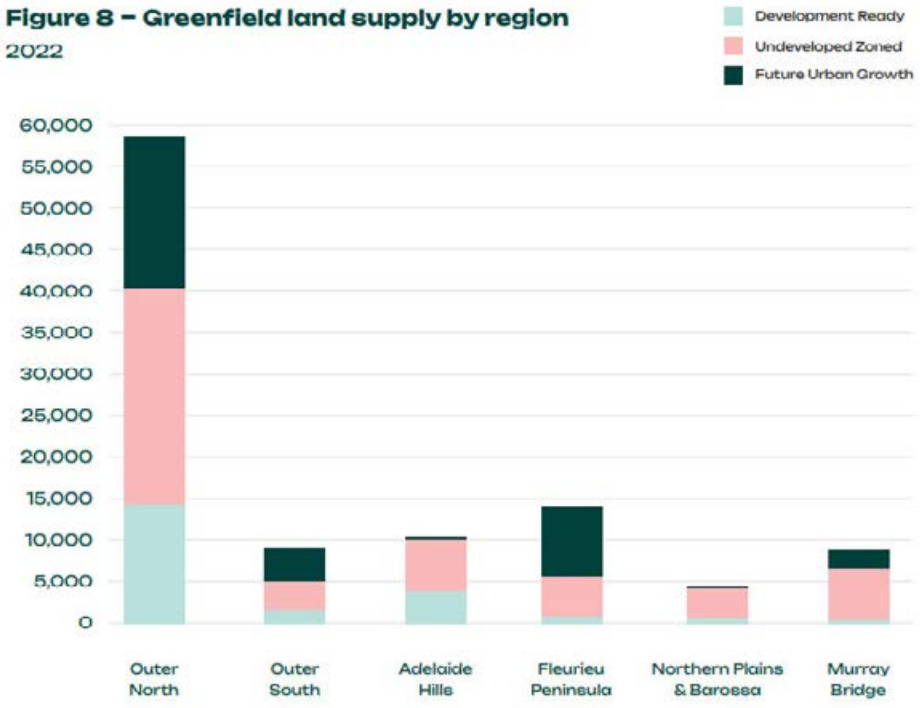

Figure 1: Greenfield Land Supply by Region
Source: SA Government, GARP Discussion Paper

In the past, the simple response to the need for additional land for development in all sub-markets throughout Adelaide – essentially anywhere other than the 'outer north' – has been to place it in the too-hard basket. However, these reasons are largely historical and in appropriate locations there is community support for consideration of land that has long been locked up.

The most recent review of the Hills Face Zone was announced by the then Minister for Urban Development and Planning in October 2002. With no formal process for review, ad hoc approaches have been made seeking to change the Hills Face Zone boundary over the last 10-15 years. However, as far as we are aware, these proposals have been unsuccessful. In appropriate locations with a set of defined criteria, land in this zone may contribute to meeting the 15-year land supply targets at a sub-market level.

The UDIA is aware of community support for a fresh consideration of Hills Face Zone boundaries and amendments in other locations in the Environment and Food Production Area (EFPA). This includes from the industry association AUSVEG SA who note the blunt instrument that is the legislation does not necessarily support the goals of all the industry.

With the challenges of identifying land for development across Greater Adelaide, it is important that this review does not instantly discount land merely because it has not been considered for an extended period of time. By its actions so far, the Government has shown it understands the need for land supply is urgent.

Previous UDIA submissions have called for a land supply dashboard and such a dashboard would support analysis of sub-markets in Adelaide. The Government is to be congratulated for accepting this recommendation and is developing the dashboard. It has been announced previously that the dashboard will be launched in the 2023/24 financial year.[3] In addition to taking a different approach to land supply to recognise the importance of these sub-markets and establishing land supply pipelines to support these markets, the UDIA also calls for the Land Supply Dashboard to be released as a matter of urgency. The release of this dashboard will improve transparency and support development activity with timely and accessible data.

The UDIA would welcome more detailed land supply modelling that demonstrates how and when land will be available for intended development. The State Government is encouraged to consider infrastructure planning in conjunction with the GARP to ensure infrastructure that supports land availability is delivered in a timely, coordinated, and equitable way.

The UDIA recommends that existing land supply reports be more specific and transparent regarding the availability of 'development ready' land. For example, by mapping land that is currently available for development, land that will be ready in 2 years, ready in 2-4 years, ready in 5+ years etc and identifying what is needed by way of infrastructure or strategic planning to deliver the land.

With the need for an additional 300,000 homes and land to supply these homes the UDIA supports a strategic planning outcome that will support and facilitate the delivery of land for residential growth.

While some action has been taken at the start of this year with the Government's land release as part of its Better Housing Future policy, the land release has not yet led to improved housing affordability. The reasons for this are clearly related to the work that remains to be done to convert this identified land into land that can actually have houses built upon it.

The UDIA recommends adding a serviceability lens to the Land Supply Dashboard as this will provide a more complete picture of what land is indeed contributing to the important competitive market tension that drives housing affordability.

This leads to the industry's position that there is not an actual 15-year *market ready* supply of land. The consequence of this lack of a 15-year market ready supply of land is the current Housing Affordability Crisis. The critical importance of the 15-year rolling land supply is that it is fundamentally linked to legislative requirements for the identification of further land for growth through the EFPA.

Given the time it takes to get land to market through rezoning and infrastructure processes, adding the political element of legislative change or land identification through quinquennial reviews threatens significant delays to the release of land that threaten a functioning land supply pipeline. We strongly encourage the Government to reconsider the 15-year test. The current infrastructure crisis that is threatening development in the outer north of Greater

[3] https://plan.sa.gov.au/state_snapshot/better-housing-future/land-supply-dashboard

Adelaide strongly suggests that a longer time horizon is needed as SA Water funding is also constrained by the Essential Services Commission of South Australia (ESCOSA) process that also occurs too infrequently. This will be considered in further detail later in this submission.

A substantial amount of information on this matter is included in the UDIA submission to the State Planning Commission on the review of the EFPA (see Appendix C). It is noted that elements of this review were addressed by the Government and that this resulted in the Land Supply Methodology review in August 2022. We applaud the Government for this review and hope that further consideration will be given to the outstanding matters.

2. Land Supply - Infill

With an acute need for the urgent provision of housing, opportunities for delivery of a range of housing types within existing urban boundaries must also be investigated, supported, and promoted. Furthermore, reforms that support the GARP to enable the free functioning of the market and the capacity for people to better match their housing to their circumstances should be considered, particularly further stamp duty relief as the UDIA has previously called for in the grow.reform.build paper (see Appendix A). The Government's 2023/14 State Budget recognised the value of Stamp Duty reform in delivering improved housing outcomes and further reform of this regressive tax should follow.

Opportunities to identify and unlock land supply for infill development rely more on setting of targets and creation of an authorising environment which is more conducive to growth, rather than the identification of suitable land to facilitate greenfield development. The underpinning need for more housing is, however, consistent for both forms of development. As such, this section will focus more on the elements of targets and types of infill development.

Central Business District Population Targets

The projected population targets for the CBD are bold and will need progressive and forward-thinking initiatives to be realised. A bigger capital city can further the revitalisation of the heart of the Greater Adelaide region and is a necessary step to drive Adelaide as a global city and a great place to live and work. The ambition for a more densely populated city centre and the many benefits this additional population can bring to the city itself as well as the broader metropolitan area is supported.

Strategic and General Infill

The UDIA notes there is a focus on strategic and general infill sites in the Greater Adelaide region. The UDIA is strongly supportive of strategic infill and firmly believes strategic infill should be the Government's preferred form of infill development and should facilitate a system which reflects and promotes strategic over general.

More should be done by the State Government to effectively allow for strategic master planning in the inner metropolitan suburbs to support growth. This will allow for development to be delivered efficiently providing greater certainty for both developers and those in need of housing.

The UDIA is generally supportive of increased height provisions, especially in those areas such as Urban Corridor Zones and Strategic Infill sites. The UDIA acknowledges and

promotes the need for increased density in the inner metropolitan area of Greater Adelaide, in particular through increased height and density.

As a general statement in terms of both infill and greenfield development, diversity in housing choice needs to be supported, with diversity including:

- Housing type and size;
- Housing options allowing for a range of demographics and abilities in the same area;
- Housing for aging allowing downsizing in the same suburb; and
- Affordable housing options, including build to rent housing typologies.

The UDIA is supportive of development in the land surrounding the parklands and incentives to encourage development in this area. The UDIA are also supportive of strategic infill on a smaller scale to allow for better planning outcomes on repurposed sites. Further conversation is needed about how to unlock medium to higher density projects in appropriate areas.

3. Infrastructure

Infrastructure provision is fundamental to achieving the urban growth anticipated in the Discussion Paper whether it is in greenfield or infill areas. As such, infrastructure planning and delivery must be a key focus for the State. Critically, the industry and community require certainty that key infrastructure will be delivered in a timely, coordinated, and equitable manner. With the housing affordability crisis and lack of both social and affordable housing, the community and industry need certainty that key infrastructure will be built to enable the completion of these much-needed developments.

Clarity on the strategy for infrastructure delivery is required to provide developers with certainty to plan and invest in new development. Without this certainty, the State is at risk of losing key strategic development projects.

Previous UDIA submissions have highlighted that all of society benefits from new infrastructure. Even those far away from a new piece of major transport infrastructure may indirectly benefit, while those living, working, or investing in close proximity benefit both directly and indirectly.

The current challenges facing the state are the consequences of early identification and adequate scoping of urban infrastructure that has been lacking for an extended period of time. Our previous recommendation to address this, that a single designated authority be tasked with the early planning and scoping of urban infrastructure for growth areas, has been recognised by Government with the recent establishment of the Housing Infrastructure Planning and Development Unit (HIPDU). We welcome Government taking this action and we hope to see this unit forcing Government agencies to coordinate and act on the urgent infrastructure needs facing our state.

Systemic issues still exist however with the ESCOSA quadrennial review of SA Water charging. This creates a structural constraint on growth infrastructure expenditure. Additionally, ESCOSA places significant prioritisation on existing SA Water customers over adequately providing for growth. The infrastructure provision crisis in the ‘outer north’ of metropolitan Adelaide makes clear that the current arrangements must be changed. A

funding process that has greater focus on the necessity of growth and flexibility to respond to changing conditions is essential to resolving some of the issues with SA Water infrastructure provision.

It is notable that the current GARP review is occurring along a similar timeframe to the South Australia 20-Year State Infrastructure Strategy Discussion Paper. It is encouraging in that it is hoped there will be integration between land use planning and infrastructure planning. In order to make this a success, the UDIA recommends Government explicitly allocate responsibility for this integration and coordination to a single agency and a single Minister.

Beyond being required to enable the orderly development of land for housing, infrastructure planning also plays a key role in efficient development and is also a key factor in housing affordability. As such, it is concerning that the GARP Discussion Paper produces an infrastructure costs comparison table that was not comparing developments of a similar type in different locations, but instead appeared to be attempting to engineer a particular outcome. Understanding relative infrastructure costs is far too important for the comparisons of 1-3 bedrooms developments in one location to be implied as equivalent to 3-4 bedrooms in different locations.

Furthermore, the costs excluded from the comparison include demolition works and environmental issues, in particular contamination, that in the words of the Infrastructure SA note "are likely to be more prevalent in inner area locations and projects." While these costs are excluded, civil works, including all roads and stormwater within, and intersecting with, the development area, as well as earthworks, lot benching and retaining walls for lots are included in the table and can represent one of the largest costs for developers. Once again, this choice to include costs for civil works skews the comparison in favour of infill over greenfield development.

With principle 7 of the Commissions considerations for identifying land for housing and jobs being "*Identification and prioritisation of growth areas will be based on the transparency of costs to community (infrastructure provision, housing cost, ongoing living costs, climate change resilience costs) for differing forms of supply*," it is essential that this transparency is based on equal considerations. It is also important that the State's responsibility for trunk infrastructure is identified in advance, planned for, and funded.

Returning to the Land Supply Dashboard, transparency of infrastructure plans and an integration of these plans into the Land Supply Dashboard can aid the appropriate identification of sufficient land that is developable and can support the needs of the State.

Finally, infrastructure should be delivered to underpin a market driven efficient urban form. This will support development in all areas of Greater Adelaide and will support the sub-market considerations outlined in the land supply section. This will move Adelaide beyond the simplistic ratio targets of development that have not served our state well as they have led to the current Housing Affordability Crisis.

4. Skills Shortage

The UDIA is aware of a skills shortage in South Australia, with the surveying course only recently being reintroduced to Flinders University, no undergraduate planning degree in South Australia and a known shortage of skilled workers across the industry including builders, engineers, planners, and lawyers. Without an appropriately skilled workforce the growth aspirations in the GARP will not be deliverable.

The UDIA calls for additional funding by the State Government being made towards the retention of key industry staff and retention of our young people, making South Australia a more attractive place to live and work, and the establishment and promotion of tertiary courses to deliver the skills needed.

Employment

The UDIA supports the creation of thriving communities, with employment opportunities being a key focus of this. With the creation of jobs and the notion of 'living locally' comes the creation and retention of employment land. We would like to see the appropriate retention and creation of employment land throughout Greater Adelaide and the Adelaide CBD. This means an appropriate mix of zoned land throughout, with care taken to protect strategically valuable employment land from rezoning.

We are also interested in greater clarity regarding the smarter and cleaner economy and related jobs for the state mentioned in the Discussion Paper. With the biggest sectors for future employment outside of the construction industry including:

- Defence;
- Education;
- Primary production;
- Clean energy;
- Space;
- Resources; and
- Health (medical and biotechnology).

We hope that the vision for the economy considers the employment needs of future residents of Greater Adelaide.

Conclusion

Proper planning for growth gives the State the greatest opportunity to deliver a built form that meets the needs of South Australians over the coming thirty years. There is an urgency to deliver this growth that has not previously been common to South Australia with plans and targets that, if met, will set up the State to thrive. The future of our State needs the Government to rise above the old NIMBY arguments that until now have far too often derailed projects that have strategic planning merit. The scale of the challenge calls for the highest levels of conviction and leadership.

That is why the UDIA is focused on highlighting the need for additional land supply (in the short and long term) supported by infrastructure (hard and soft) to support growth and create thriving communities. While it may be easier to project growth and land consumption rates that avoid difficult debates about the nature and location of future developments, the Discussion Paper provides the right platform to have this important discussion with all South Australians. We look forward to an outcome that matches the State's ambition for the future of the South Australia.

APPENDICIES

Appendix A – grow.reform.build - UDIA 2022 State Election Priorities

Appendix B – UDIA Submission - Planning System Implementation Review 2022

Appendix C – UDIA Submission – Environment and Food Production Areas Review 2021

grow.reform.build.

URBAN DEVELOPMENT INSTITUTE OF AUSTRALIA (SA)

2022 State Election Priorities

For more information about the Urban Development Institute of Australia (SA) 2022 State Election Priorities, please contact:

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Find more information about the UDIA (SA) and our advocacy work on our website udiasa.com.au

grow.reform.build.

URBAN DEVELOPMENT INSTITUTE OF AUSTRALIA (SA)

2022 State Election Priorities

Urban Development Institute of Australia
SOUTH AUSTRALIA

Reade's Plan for Mortlock Park 1917.

South Australia's rich history of planning extends far beyond just the City of Adelaide.

In 1916, Charles Reade was employed as South Australia's (and Australia's) first Government Town Planner.

Shortly following his appointment in 1917, he designed a new suburb with the working title 'Mitcham Garden Suburb'. His plans were shown publicly and for the first time at the first Town Planning and Housing Conference and Exhibition in Adelaide in October 1917.

We now know this suburb as Colonel Light Gardens.

URBAN DEVELOPMENT INSTITUTE OF AUSTRALIA (SA)

2022 State Election Priorities

grow

Address the housing crisis.

Modern planning for growth and liveability.

reform

Transparency and accountability for home buyer levies and taxes.

Invest funds collected for open space on open space.

build

Better and more community infrastructure.

Stop taxing production of housing.

Contents

Message from the President	7
Message from the Chief Executive	8
About the Urban Development Institute of Australia (SA)	9
Introduction	10
Grow	**13**
Address the housing crisis	14
Modern planning for growth and liveability	21
Reform	**25**
Transparency and accountability for home buyer levies and taxes	30
Invest in open space	33
Build	**39**
Better and more community infrastructure	40
Stop taxing production of housing	43
Summary of Recommendations	44

Message from the President

For 50 years, members of the Urban Development Institute of Australia (SA) have passionately contributed to the success of our great state.

They have created employment for tens of thousands of South Australians and built places that we call home.

As passionate as our members are, increasingly as they risk their livelihoods, more and more regulatory and financial obstacles continue to be put in place that prevent them from delivering more of the great Australian dream.

UDIA members know that we must protect our liveable city — but that there is a better way.

We need better planning and growth strategies for our city, our existing taxes and contributions need to be better spent, and we urgently need more clear and transparent policy making based on better data. Above all we need a more collaborative approach.

A new or returned State Government must work alongside us so we can help create the conditions that support development. One where we return the pendulum back to place so more of us can invest with confidence and create the new communities we so desperately need.

When our members are active, the economic heartbeat of the state is stronger.

Our blueprint for prosperity, **Grow, Reform, Build** has been developed to serve as a guide to turbo charge the positive change that will enable our state to maintain liveability for the benefit of all South Australians — now and into the future.

On behalf of the UDIA, we look forward to working side by side with the future State Government for the benefit of all South Australians.

Daniel Palumbo
President

Message from the Chief Executive

In the lead up to the 2022 South Australian State Election, the UDIA SA is calling on all political parties and candidates to focus on maximising South Australia's opportunities as an attractive place to live, work and invest, to enable our communities to prosper.

To strengthen and diversify our economy, the incoming government must fully leverage what our state can offer the people who live here and those who are considering business here, travelling here or relocating here in the coming years.

To maximise South Australia's opportunities as the ideal place to live, work and invest, UDIA SA has developed key recommendations built around three key pillars — **Grow, Reform and Build.**

Our recommendations are designed to ensure that South Australia's urban development industry can continue to prosper and play a key role in the continued success and growth of our state for the benefit of all South Australians.

Not only is the urban development industry a significant employer, representing the second highest number of fulltime workers (77,200 employed) in South Australia and $7.8 billion in gross value added to the economy, but our industry facilitates and supports the delivery of high-quality urban infrastructure critical to providing all South Australians with the opportunity to succeed.

We want to work together with the incoming government to harness our state's unique and positive characteristics and build on our reputation not only as Australia's most liveable city and the world's third, but as the best place to live, work and invest.

Pat Gerace
Chief Executive

About the Urban Development Institute of Australia (SA)

The Urban Development Institute of Australia (SA) was established in 1971 and is the leading representative body for the urban development industry.

With representation nationwide, we work for the benefit of the South Australian industry and alongside other State and Territory divisions to advocate for meaningful policy reform locally and nationally.

The UDIA in South Australia is a not-for-profit membership organisation. Our members that we represent includes all organisations and people involved in the development of homes, infrastructure and suburbs — the foundation of our current and future communities.

We exist to support the urban development industry — South Australia's third largest employing sector with the second highest number of fulltime workers, boasting more than 77,000 full time employees across the state.[1]

Our purpose is to represent the views, wants and needs of those within our sector — and equally those of their customers who are everyday South Australian homeowners, aspiring home buyers, renters and our most vulnerable residents, including those eligible for social and affordable housing.

We work to promote excellence and innovation in the creation of sustainable and thriving communities, as well as educate and engage with the government and urban development sector on all issues affecting new residential property, particularly pertaining to affordability and liveability.

Our valued members benefit from exclusive access to a range of purposeful policy updates and relevant advocacy information that are pertinent to the development industry, professional learning and development opportunities, and insightful events that connect, engage and build networks.

Ultimately, everything we do is to ensure a thriving urban development sector in South Australia — for businesses, for people, for communities and for our future.

1. https://www.abs.gov.au/statistics/labour/employment-and-unemployment/labour-force-australia-detailed/latest-release

Introduction

A solid foundation for success

As South Australians we are parochial about our great state. Among the many things we treasure about our place is that it is a great place to work, live and play.

Successive South Australians have called the suburbs of Adelaide home; a place where they have raised families and enjoyed a quality of life that is the envy of others both interstate and abroad.

Much of this is possible thanks to generations of South Australians who have invested in growing our state and economy, planning and building infrastructure so that every future generation has the best foundations to create their own success.

It's not surprising that many political leaders like to highlight Adelaide's high liveability rankings or quote median house prices in South Australia to demonstrate the great work they are doing.[2]

Unfortunately, while spin and social media are used to promote South Australia, our leaders rarely talk in detail about what they are doing to protect everything we hold so dear about our state. Liveability is a term they frequently reference, yet most are reluctant to specifically define it.

We know that as much as work, live and play are important, it's also the balance between these that makes a place emphatically liveable. Finding this balance is why the UDIA has developed Grow Reform Build — South Australia's 2022 State Election blueprint for prosperity.

Commitment from the urban development sector

The UDIA represents the property development sector and all within it — the South Australians who are proud to build new suburbs, the buildings that people call home, and all the surrounding infrastructure that lay the foundations for these places to become thriving communities.

Our members sell to, build for and employ South Australians, knowing as well as anyone what they value most. South Australians want suburbs with open space, trees and high-quality public realm. They value ready access to services such as transport, education and health facilities.

With the combined strength of our members, we know what is needed to protect our state's liveability.

Our plan to grow, reform and build

As a membership body we are uniquely placed to see and experience first-hand what South Australian's value most about the places they live.

We also see and experience each of the different and competing interests of policy makers, agencies and levels of government, and how they are often at odds with each other.

From a state-wide perspective, we see that without necessary and thorough planning, development can adversely change the character of our existing suburbs and streets.

We see the impacts of a lack of investment in public transport, roads and trunk infrastructure and how this neglect can easily lead to the same congestion and 'growing pains' being witnessed interstate.

That is why we are calling for vastly improved and more detailed planning, based on better data and an understanding of what people need and value, rather than telling them what they want.

UDIA believes that a key focus for our state now and into the future should be that South Australia continues to be undoubtedly the place where you can still achieve the great Australian dream.

Home ownership means different things to different people — for some it is in a compact denser neighbourhood or apartment, for others it is a place where you can have a trampoline, trailer and a dog.

For those that can't afford to invest in purchasing a home, the certainty that comes with knowing a place to rent is affordable and available, in an area that they are attached to or familiar with, can make a significant difference.

We know that a place to call home offers undeniable sense of safety, security and stability — a fundamental human need as defined in Maslow's Hierarchy of Needs, and is a proven pathway to intergenerational prosperity.[3]

This is why we are calling for a renewed and dedicated focus on home ownership.

Unfortunately, there are a broad range of government policies that do not consider the impact on housing affordability, either directly or indirectly. The hidden cost of land and new housing through state and local government levies and charges — and many of those don't get reinvested when and where they are collected — must be addressed.

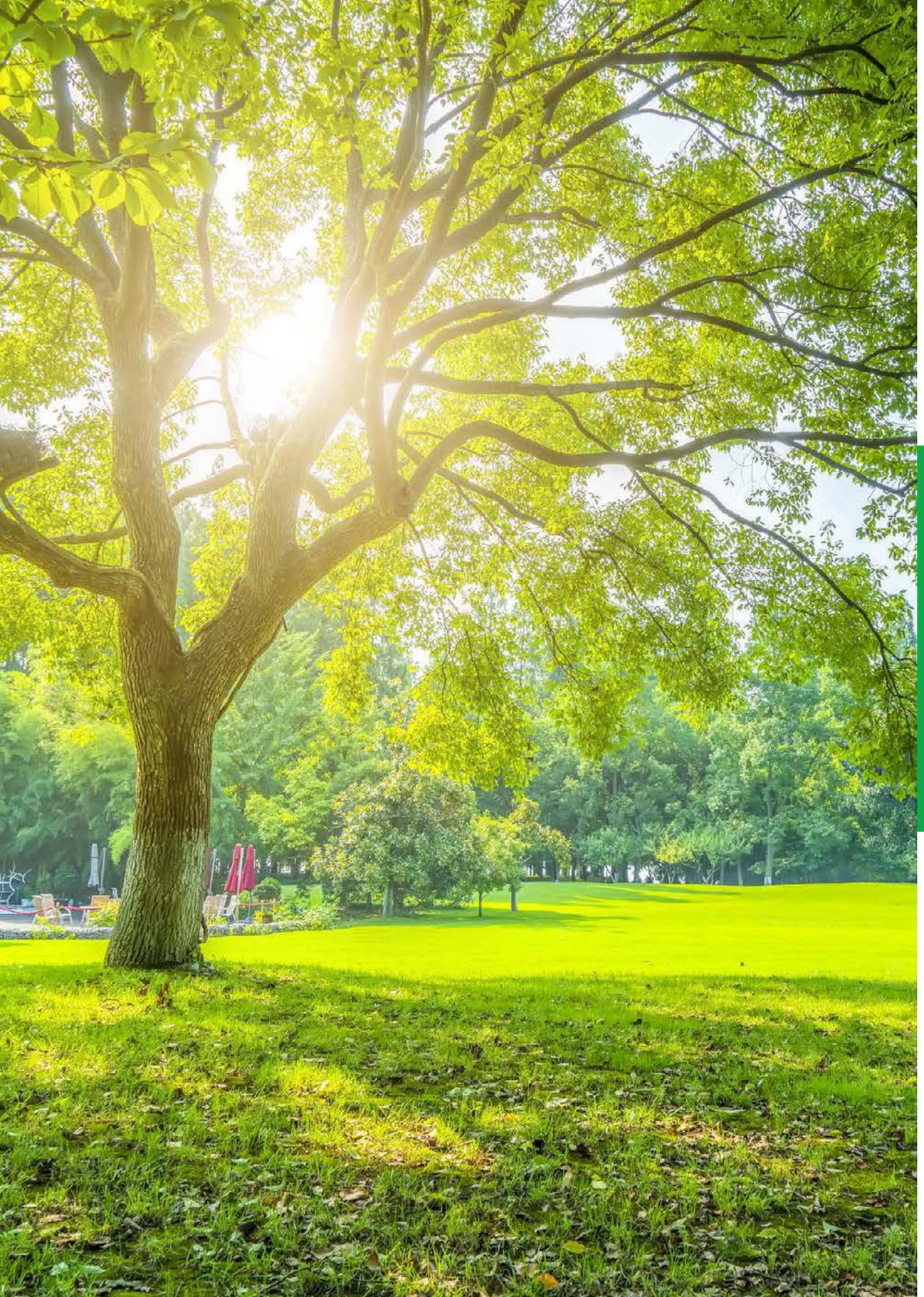
Another key focus is to rectify the failures of our planning system that currently does not operate with any genuine connection to what the majority of South Australians value most.

The three pillars outlined in this document, Grow, Reform and Build, are targeted recommendations to get South Australia back on track.

Some are immediate steps to make a material difference, and others represent the beginning of a transformative journey that will lead to new and better approaches to urban development, more suited to South Australia's modern environment.

2. Economist - https://melbourne.org.au/wp-content/uploads/2021/06/global-liveability-index-2021-free-report.pdf

3. https://www.aihw.gov.au/getmedia/602000e9-adef-4939-a767-61945a7f6c06/haia-c01.pdf.aspx



grow

Address the housing crisis

South Australians have always been proud that, for a vast majority and those lucky enough to be employed, if they wanted to own their own home, it was possible.

However, the alarm bells are ringing and many are already describing the current housing situation in South Australia as a crisis — the great Australian dream of owning a home is quickly becoming out of reach for some.

For South Australia, subdued population growth and relatively flat labour markets compared to other states have helped contain house prices in the past, but post-pandemic and with renewed interest in South Australia, we can no longer rely on those circumstances to protect things we hold dear.[4]

What and whether you can buy a house is a function of how much you earn and unfortunately on this metric, our housing market is the third least affordable nationally — falling behind Brisbane and Perth, even with a less buoyant economy and weaker immigration figures.[5]

The two largest contributors to this problem from a state perspective is the failure to plan for growth and the hidden cost of land and housing.

Graph 1: Adelaide Metropolitan Area

Median house prices by quarter (2000 – 2021)

Source *sa.gov.au*

4. https://www.sa.gov.au/__data/assets/image/0008/169748/3rd-quarter-2021-metro-median.png
5.Demographia

Source
sa.gov.au

54%
increase of median house prices in Adelaide since 2011

$600k
median Adelaide house price

The benefits of home ownership

+ Because the value of their homes are directly affected by what happens in the surrounding community, owner occupiers are likely to have stronger incentives than renters for civic involvement.

+ Home ownership provides greater security of tenure, reinforcing incentives for community participation. Less frequent relocation also minimises disruption to established social networks and children's education.

+ By giving occupiers more control over their living space, home ownership can enhance self-esteem, in turn reducing the incidence of socially disruptive behaviour and promoting physical and emotional wellbeing.

Source

Australian Government Productivity Commission Inquiry Report — First Home Ownership, March 2004

Challenge

Current system is not conducive to housing affordability

The residential development industry builds homes for South Australians, delivers critical economic activity across the state and is reliant on two key factors:

1. Development must be commercially viable and is largely driven by the cost of land, construction and the value of the end product; and
2. Residential products (homes) delivered to market must be relatively affordable for homebuyers at different income levels.

The major reason for diminishing affordability is the hidden cost of land and housing imposed by taxation, regulatory charges and development delays which reduce feasibility and increase the purchase price.

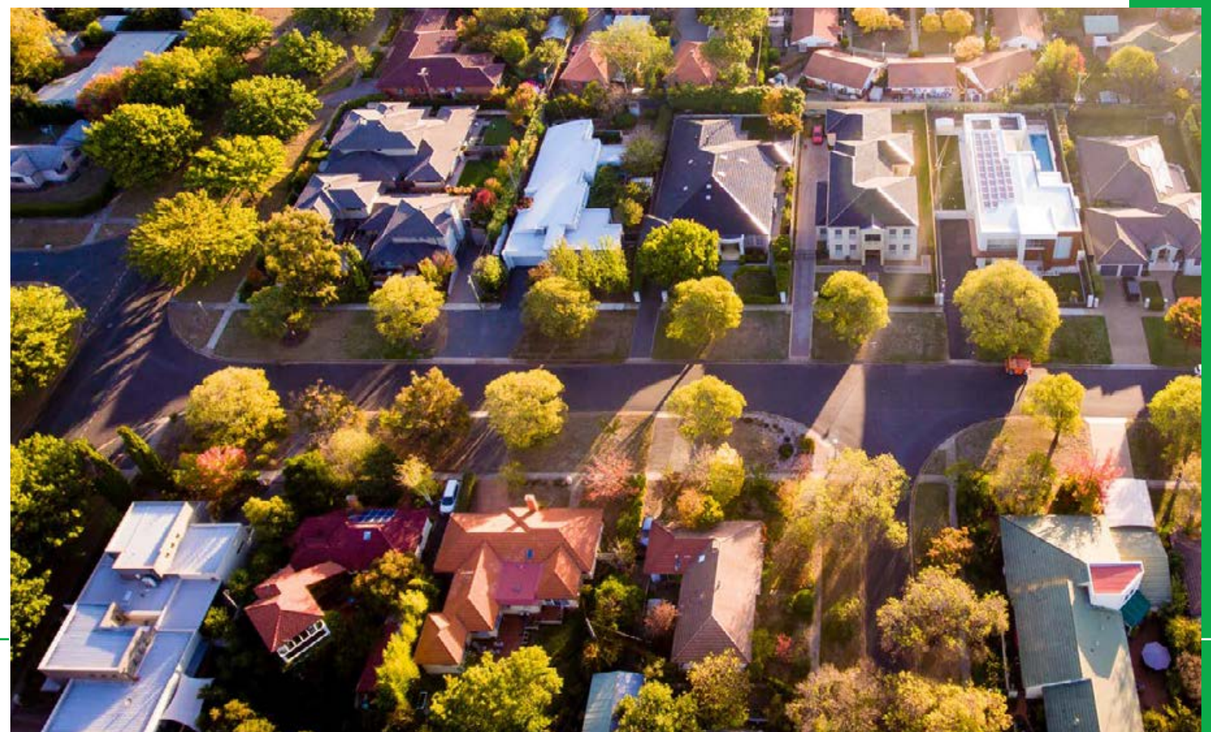
Addressing housing affordability should involve a series of measures that make housing accessible to all South Australians — not just mandating contributions and restrictions through the planning system.

Successive governments have hidden behind announcements about building and maintaining public housing stock which might provide some affordable housing — this is not the same as housing affordability.

While there is an important and critical role to assist those most in need within our community, the majority of South Australians will not qualify or want to access public housing, but that doesn't negate the responsibility or need for measures to address the affordability of housing for them.

Taxes and charges all contribute to retail pricing. Though often hidden, these costs are paid nonetheless and must be funded by the homebuyer or paid back over time through their mortgage.

With land and construction costs already under pressure, it is the hidden costs of housing that we ask a future state government to immediately address.



Housing affordability — how we stack up

On an international scale, Adelaide is right up there with our eastern seaboard counterparts as unaffordable.

Affordable

Most affordable
Pittsburgh, U.S.

2 Rochester, U.S.

3 Buffalo, U.S.

Unaffordable

23 Perth, Australia

•

18 Brisbane, Australia

•

13 **Adelaide, Australia**

•

6 Melbourne, Australia

•

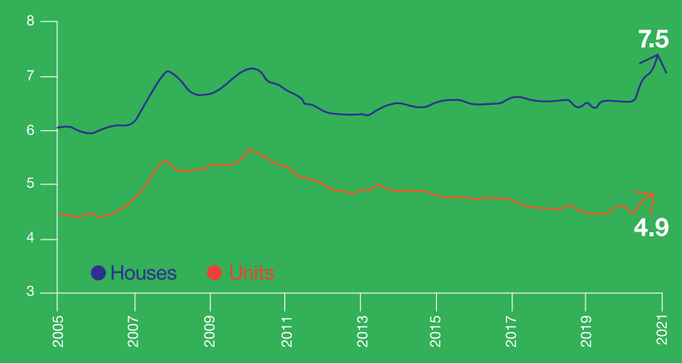
3 Sydney, Australia

2 Vancouver, Canada

Most unaffordable
Hong Kong, China

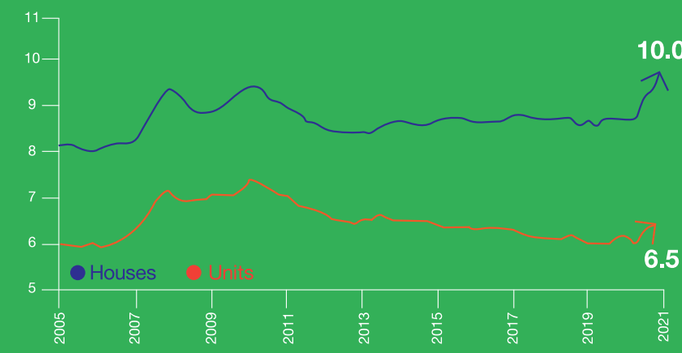
Source *2021 Demographia International Housing Affordability*

Graph 2:
Value to household income ratio



In South Australia, housing values are growing disproportionately to household incomes so saving a deposit has never been more challenging.

Graph 3:
Years to save a deposit



Source *Core Logic*

Springwood, Gawler East

Taxes and charges collected by the government

Developer Land Tax	Infrastructure Contributions
Stamp Duty (twice being paid, once by the developer and once by the homebuyer)	Open Space Contribution/Levy
	Developer Council Rates
Foreign buyer surcharge	Utility charges
	Code amendment fees
GST	Development approval fees

$215m Homebuilder stimulus drove additional $215m Stamp Duty above forecast in just one year!

Stamp Duty – the most inefficient and punitive tax of all

It is the single biggest transactional cost for purchasers of residential property. It acts as a disincentive to the turnover of housing stock and encourages homeowners to hold onto existing properties rather than find new accommodation more suited to their needs, as well as reducing redevelopment opportunities

With review after review, the one thing everyone agrees upon is that it is inefficient, punitive and serves only one purpose — to collect revenue. With government budgets constrained due to the pandemic and short-term relief measures unaffordable, there is no better time to start a discussion about a pathway for wholesale reform in the future.

South Australia has already removed commercial stamp duty entirely and the Commonwealth and other states have commenced conversations and reforming residential stamp duty. An incoming government must make a commitment to reform so we are not left behind.[6]

>$22k
collected on the median house price

$1.736 billion land tax and stamp duty revenue for South Australian Government forecast for 2021/22

Source
2021–22 State Budget, page 37

6. *https://www.nhfic.gov.au/research/researchreport/stamp-duty-reform/stamp-duty-reform-benefits-and-challenges/*

Challenge

The hidden costs of housing and development

There has never been a more critical time to get real about the high cost of housing of land in South Australia.

With the right measures and processes, this will be critical to realising the Australian dream — keeping South Australians owning and renting their own homes, and off the government's social and affordable housing waiting lists.

Recommendations

G1 Create and fund a cross-government task force led by the State Planning Commission with representation from the building and development sector to develop a new housing affordability and ownership action plan.

G2 Allocate responsibility and accountability for housing affordability and liveability across all government ministerial portfolios.

G3 Incorporate a Housing Affordability and Sustainability Impact Statement into all relevant Cabinet submissions to ensure cost impacts of new policies on consumers are minimised.

G4 Implement a continuing requirement for a State Government review of the cost impact of all policy decisions on construction and development standards.

G5 Create focus on housing affordability and ownership by considering appropriate amendments to the Planning Development and Infrastructure Act 2016 and associated regulations.

G6 Commit to an investigation of economic reform for the provision of housing in South Australia including:

a. The development of a regulatory impact statement on all fees, charges and regulations related to the provision of housing
b. A transitionary pathway to reducing reliance on inefficient taxes and charges
c. Options for the deferral of up-front taxes and charges for consumers to improve affordability
d. Immediately abolishing stamp duty on all new residential, owner occupier, off the plan housing construction below the median house price to improve affordability and increase housing supply.

G7 Commit to a moratorium on new value capture taxes and charges.

G8 Commit to a moratorium on new or changed inclusionary zoning policies without engagement and agreement of the development sector.

Modern planning for growth and liveability

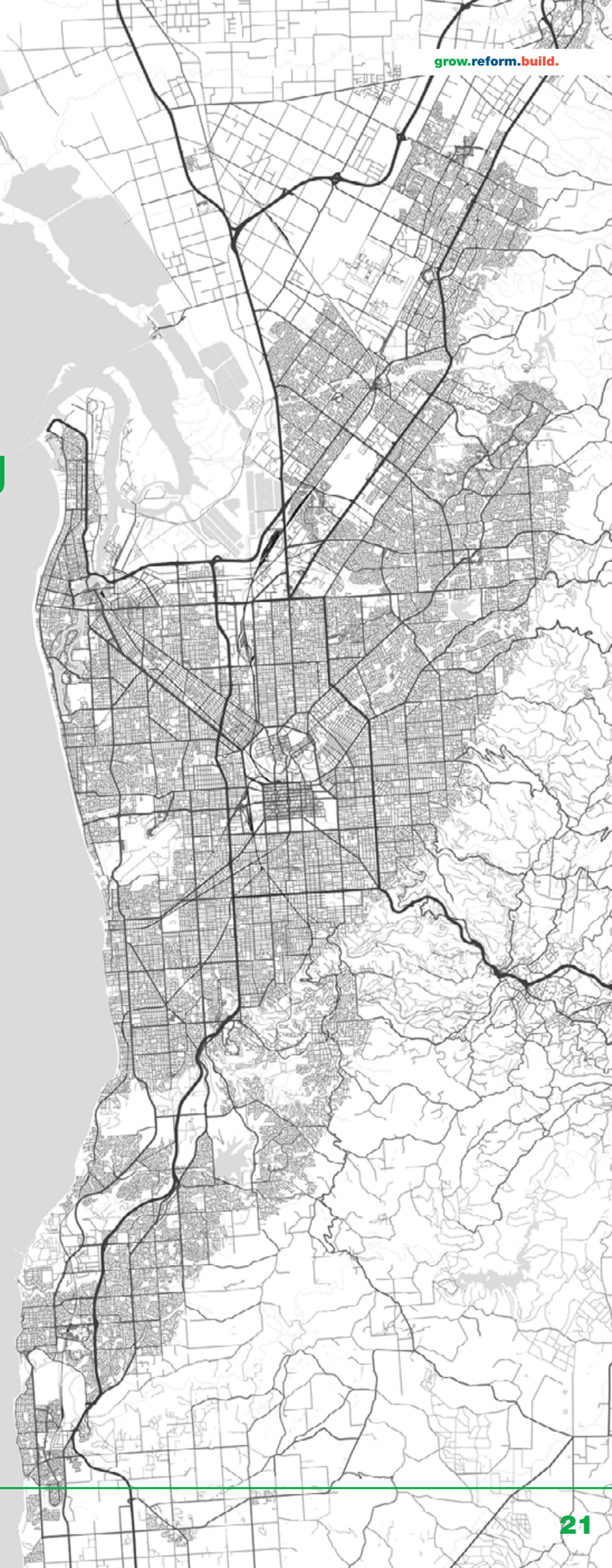
If you are from South Australia, you know who Colonel William Light is and the impact his vision continues to have on our state centuries later.

Fast forward to 2021 and unfortunately despite much talk about the planning system and lengthy debates in parliament when the new Act was passed in 2016, it is hard to say that the system is working as well as it should be.

Delivering an electronic planning system for processing applications isn't a substitute for actual considered planning for growth and has arguably moved the focus away from the planning 'outcome' to the planning 'process'.

There are two main areas that need to be addressed.

1. Regional planning policies that address the look and feel of our city, suburbs and regions encompassed in a 30-year plan for Adelaide.
2. Planning policies underpinned by evidence, metrics and contemporary data to ensure adequate supply of suitably zoned land for positive and sustainable growth in residential, commercial, and industrial areas.



Challenge

An outdated 30-year plan

Regardless of whether Adelaide's population growth is modest or strong, there is an undeniable need for a plan that ensures that the things that matter, the things that create a liveable, sustainable and thriving community, are provided for.

A plan that addresses various scenarios and adapts accordingly to shape Adelaide in the most appropriate way is a necessity — a plan that takes into account trends in living patterns and addressing affordability to maintain Adelaide's liveability.

The current version of the 30-Year Plan for Greater Adelaide simply became a list of aspirations of every government agency and a way to avoid detailed investment plans and commitments by state and local government.

One of the most obvious symptoms of not carefully planning for growth, is that more people who fear for what they may lose will begin to resent progress, and subsequently rally for no change at all. It's therefore critical that we get the planning right.

Future state and local governments must stop abdicating their responsibility for public transport, road infrastructure and key essentials for new and thriving communities, and start investing in growth and urban regeneration areas.

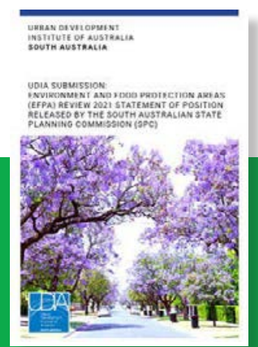
In new growth areas, incorrect assumptions and populous statements are too often used as a reason for restricting development because of the government's reluctance to invest in infrastructure.

In the 2020 Infrastructure Strategy released by Infrastructure SA[7], generalised statements about the role of growth areas were made based on the technical work of Infrastructure Victoria[8]. Unfortunately, generalised assumptions like this are at the expense of the primary driver in maintaining housing affordability, namely competitive market tension as well as providing more sustainable communities.

Other sustainability targets such as increased tree canopy for suburbs will also fail without better policies. Consumers want bigger houses and more amenities, but land prices are high and governments don't want to service growth areas, so naturally lot sizes and yards end up being smaller.

Until governments get serious about committing to and supporting a foundation for more green and spacious suburbs, simply telling developers, planners and consumers to just 'be green' is a plan destined to fail.

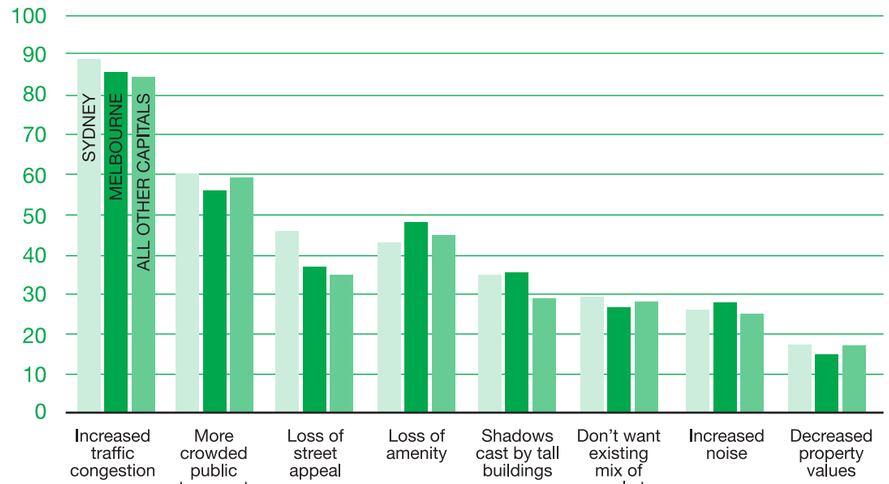
To develop a new 30-year plan that works, we must better understand what people want and create an environment that supports developers to build more of the outstanding new communities and a diversity of product — the ones that people want.



Read the UDIA SA Environment and Food Protection Areas Review Submission on the UDIA SA website

Graph 4:

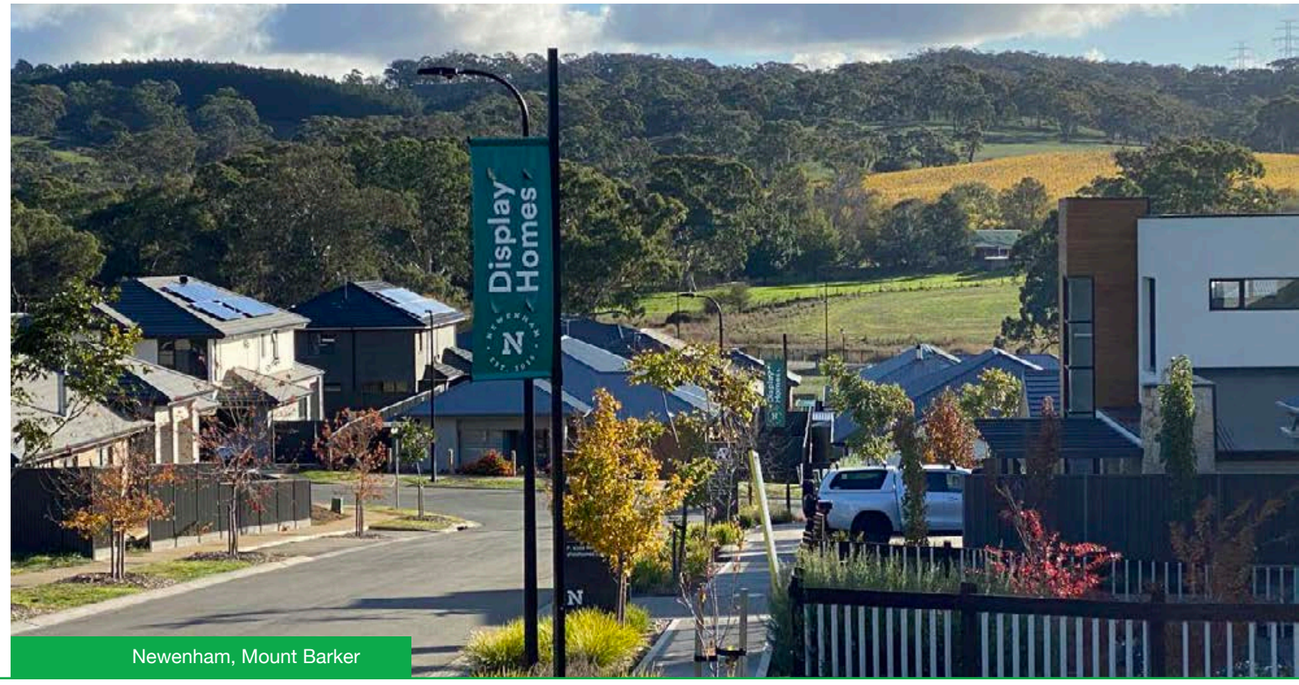
Reasons why people don't want population growth in their neighbourhood[9]



Source

Grattan Institute

grattan.edu.au



Newenham, Mount Barker

7. Infrastructure SA Strategy https://www.infrastructure.sa.gov.au/__data/assets/pdf_file/0006/197511/20-Year-State-Infrastructure-Strategy-Full.pdf
8. Infrastructure Provision in Different Development Settings

9. https://grattan.edu.au/wp-content/uploads/2018/03/901-Housing-affordability.pdf

Challenge

Failure of the Planning Development and Infrastructure Act 2016

Despite the Planning Development and Infrastructure (PDI) Act 2016 being 278 pages in length and with just as many regulations accompanying it, the word affordability appears only three times and the phrase 'housing affordability' does not appear at all.

In this context it is not surprising that in operation, the Act is failing to deliver in some key areas.

One key feature of the PDI Act is the process to review the available land supply and changes that need to be made to Adelaide's footprint.

Under the PDI Act, the State Planning Commission is required to conduct an independent review every five years to assess future housing requirements.

Since its introduction however, the State Planning Commission has had no dedicated resources, staff or independent research capability, and for what is arguably one of the most important roles of the State.

In June 2021, the State Planning Commission completed its first review and under this infrequent and slow responding model, a declaration was made that there is adequate supply for future housing needs.

The land supply analysis informing the Environment and Food Production Areas Review relied upon population forecasts that pre-date the known impacts of the COVID-19 pandemic and its implications on overall population growth.

It also failed to consider detailed modelling around the impacts of the new Planning and Design Code. In addition, land use patterns across different parts of Adelaide were not considered and instead a 'Greater Adelaide' assessment of demand and supply was used.

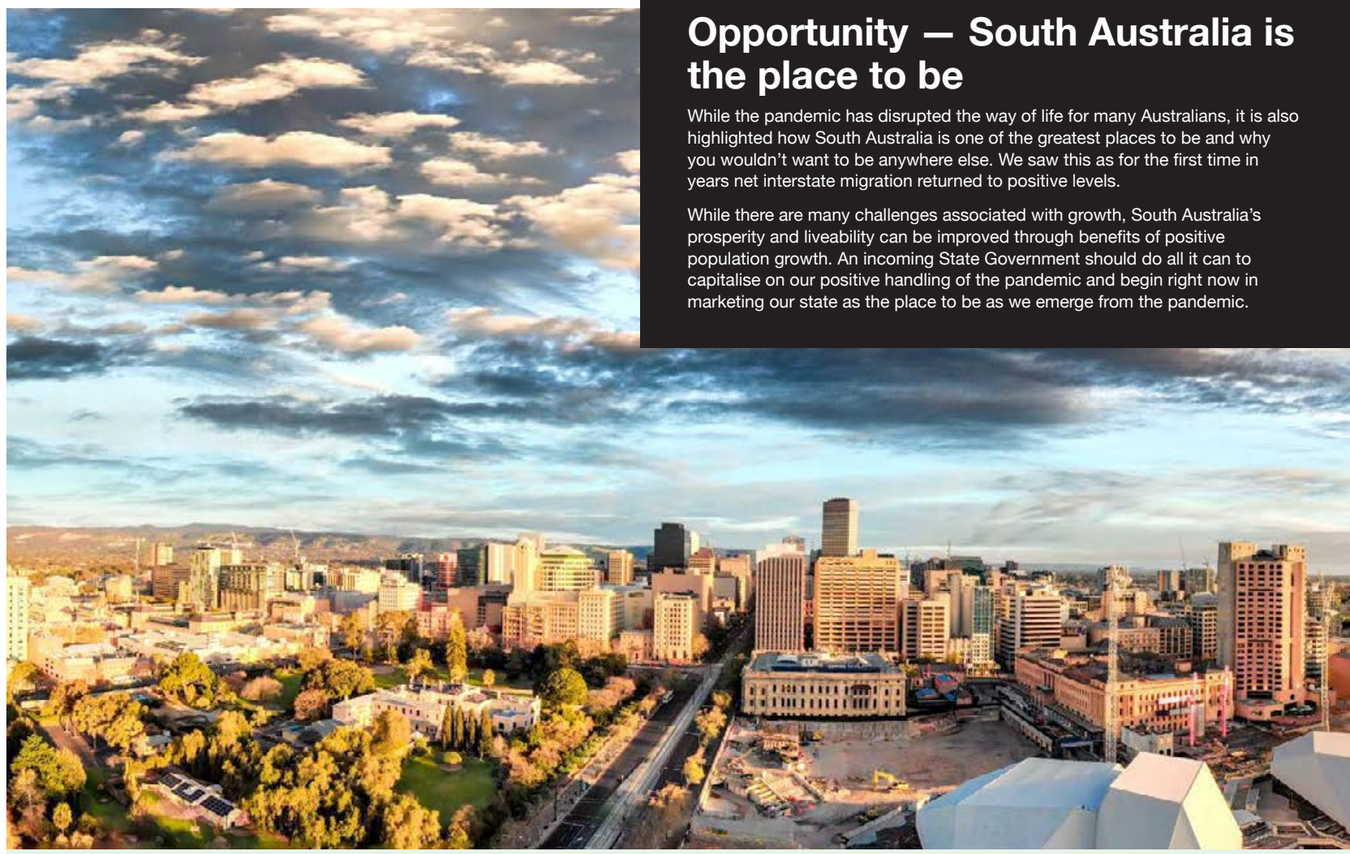
As a consequence, Adelaide now relies on assessment of its long-term strategic planning and housing needs, based on outdated assumptions, leaving South Australia facing a great hurdle in quickly responding to affordability challenges in the future — challenges already being experienced in specific parts of Adelaide.

Not only does the UDIA believe the State Government has missed the mark on this, but the conclusion is also at odds with the Federal Government's report prepared by the Federal Government's National Housing Finance and Investment Corporation, which states:

Adelaide is soon to enter a period of under-supply against demand and forecasts 'supply is likely to remain soft and below demand from 2022'.

This reinforces the need for quick responses by governments and councils.

The UDIA made a comprehensive submission to the State Government and we continue to call on them to immediately act on these recommendations.



Opportunity — South Australia is the place to be

While the pandemic has disrupted the way of life for many Australians, it is also highlighted how South Australia is one of the greatest places to be and why you wouldn't want to be anywhere else. We saw this as for the first time in years net interstate migration returned to positive levels.

While there are many challenges associated with growth, South Australia's prosperity and liveability can be improved through benefits of positive population growth. An incoming State Government should do all it can to capitalise on our positive handling of the pandemic and begin right now in marketing our state as the place to be as we emerge from the pandemic.

Recommendations

Unashamedly plan for growth to protect our liveability and make South Australia a lifestyle destination of choice by:

G9 Invest in the development of a new real time electronic urban development monitoring tool in partnership with the UDIA, to improve state-wide planning for growth, liveability and affordability, and encourage increased private sector investment.

G10 Develop a new 30-Year Plan for Greater Adelaide[10] by establishing a tripartite (local and state government and private developer) task group to develop terms of reference and coordinated with infrastructure capacity (see recommendation B1).

G11 Implement recommendations provided to the State Government and State Planning Commission in response to the recent Environment and Food Production Area review and in particular:

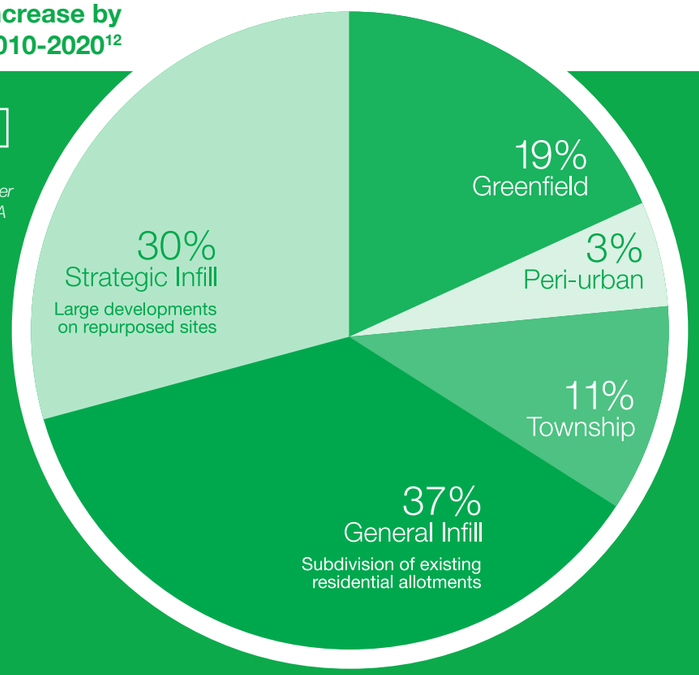
a. Ensure Regional Plans for Greater Adelaide is premised on multiple scenarios and builds in appropriate growth opportunities in locations which are sought by the market.

b. Address the over reliance in housing supply of single dwelling subdivisions and instead proactively and urgently increase land supply in market responsive locations including greenfield and large-scale brownfield areas.

G12 Independently review the operation and effectiveness of the new PlanSA e-Planning system and its impact on affordability through consultation with the development sector, councils, and utilities.

10. Referred to regional plans under the PDI Act.

Net dwelling increase by development type 2010-2020[12]



Source

Land Supply Report for Greater Adelaide, PlanSA

Part of the problem — 30-Year Plan for Greater Adelaide

The 30-Year Plan for Greater Adelaide was a useful document when first released, but 15 years on and it's time to take stock on what has worked and develop a new vision for Adelaide.

As an example, in the 2010 30-Year Plan for Adelaide it states:

By focusing growth in transit corridors we can ensure that we preserve Adelaide's distinctive urban character, leaving about 80 per cent of metropolitan Adelaide largely unchanged as a result of the Plan.

Just over a decade on, in a report released less than six months ago by PlanSA, it has been shown that development patterns have not eventuated in this way with general infill (single dwelling knock down and subdivision) representing 30%[11].

This has presented issues such as car parking, loss of tree canopy and many other issues which the State Planning Commission has had to address[13]. Some issues these create for liveability have also been articulated by the Southgate Institute at Flinders University which found that:

Neighbourhood transition is already occurring across southern Adelaide by multiple actors; however, often in ways that don't contribute to improving neighbourhood liveability. Infrastructure, streets, footpaths, open spaces, public spaces and places are maintained and constantly altered by multiple actors subject to standards that often do not conform to the optimums required to enhance neighbourhood liveability. Private built form is constantly being redeveloped via small scale ad hoc infill.[14]

Without a new plan this will go unaddressed. As can be shown in the extracts below, future land supply in the departmental reports released as recently as 2021 are for 30% of new housing supply over the next ten years form this type of development[15]. This means the demolition and subdivision of 68,000 dwellings of existing houses in existing suburbs.

With a new plan instead, we could begin a conversation about more large-scale strategic infill projects and work to unlock medium to higher density projects in appropriate areas. Better planned and more sustainable developments can include open space and, provide for suitable infrastructure upgrades. Similarly, there could be a more strategic commitment to revitalising the city centre with more residents.

The coloured areas in each of the diagrams represent demolition and rebuild areas identified by the government

Diagram 1:

Inner North

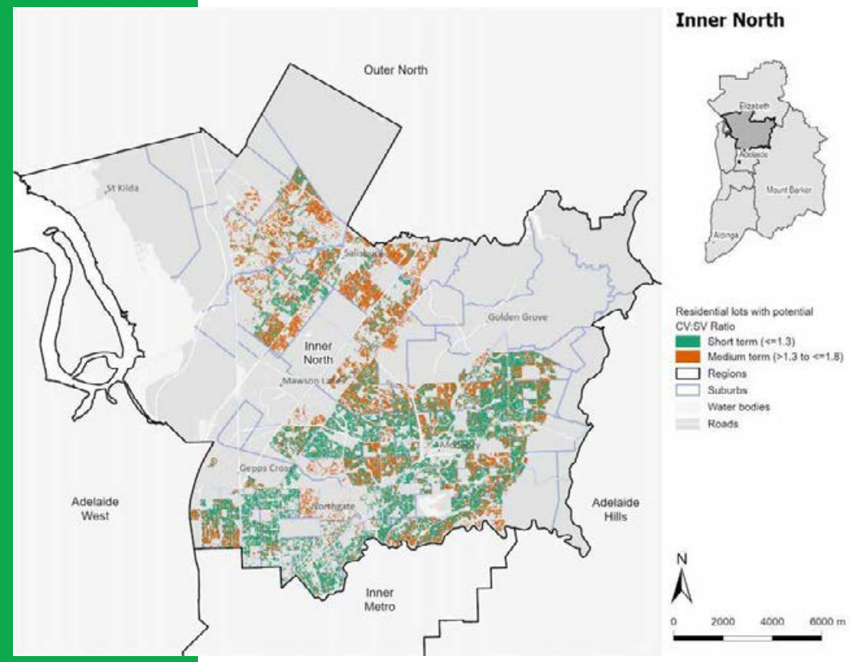
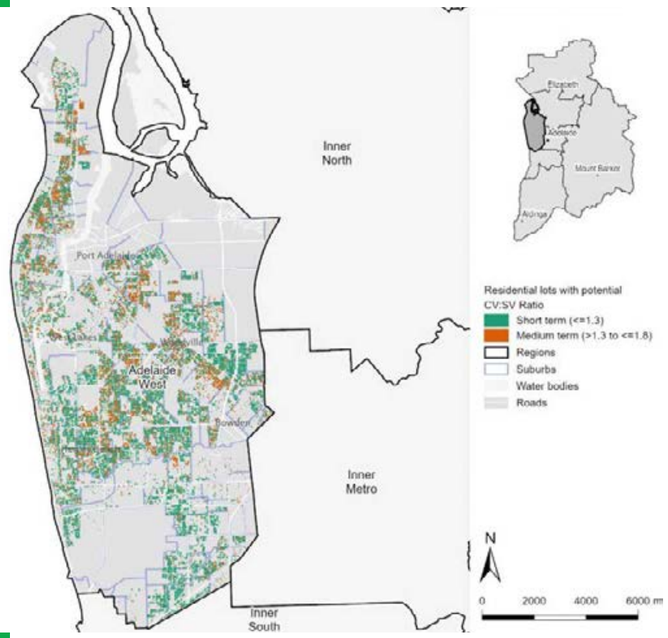


Diagram 2:

Adelaide West



Source

Land Supply Report for Greater Adelaide, PlanSA

11. Define general infill
12. Land Supply Report For Greater Adelaide, Background and Context
13. State Planning Commission Infill Guidelines
14 https://www.flinders.edu.au/content/dam/documents/research/southgate-institute/Healthy-South-HUNTT-project-brief.pdf
15 https://plan.sa.gov.au/state_snapshot/land_supply

The coloured areas in each of the diagrams represent demolition and rebuild areas identified by the government

Diagram 3:

Inner South

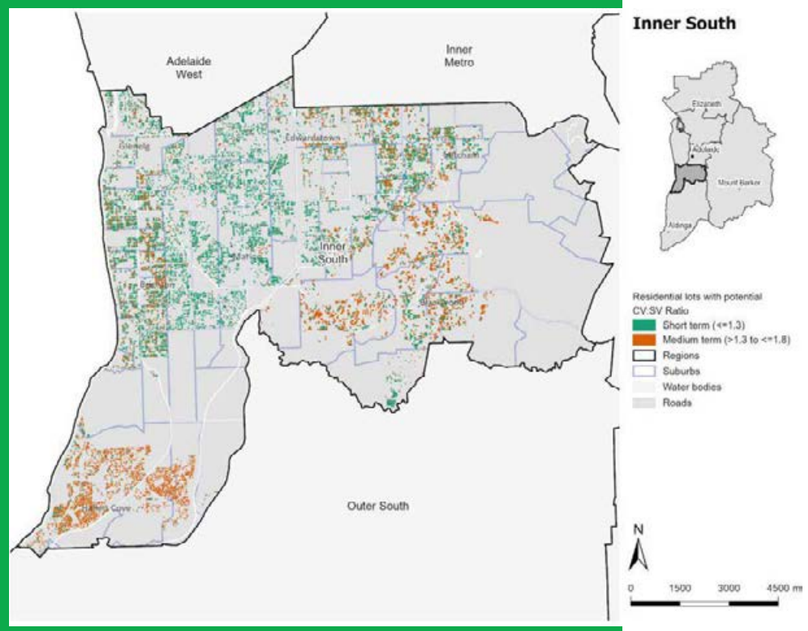
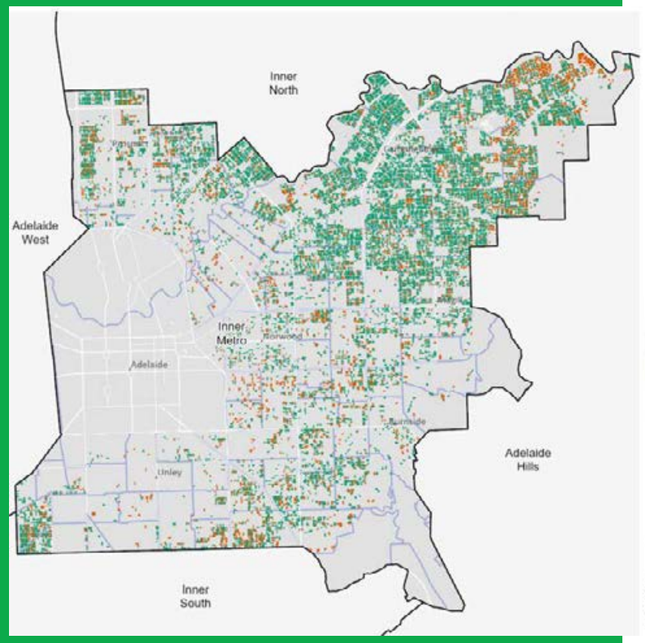


Diagram 4:

Inner Metro



Source

Land Supply Report for Greater Adelaide, PlanSA

Transparency and accountability for home buyer levies and taxes

While essential levies and taxes add additional costs to housing, infrastructure is key when determining the liveability and affordability of living in South Australia.

Unfortunately, the regulatory and governance systems that identify, estimate, negotiate and charge for the delivery of key infrastructure, is of a poor standard. This finding was confirmed in the National Housing Finance and Investment Corporation report, *Developer contributions — How should we pay for new local infrastructure?*[16]

Challenge

Infrastructure and regulatory requirements for developer approvals

State government agencies, regulators, local government and utilities often have little or no incentive to consider the impacts of housing affordability.

When developers enter into negotiations with these bodies, the temptation to offset future budget requirements or cover investment and maintenance back logs against new developments, can often be too strong to resist.

In some cases, the regulatory systems and bodies even exclude housing affordability as a consideration, or requirements can be so stringent that they exceed 'fit for purpose' due to a total risk elimination approach.

The flow on impact of our poor systems is that those who can least afford it end up bearing the brunt — and almost always for many years over the life of a mortgage.

Historical underinvestment by state and local governments is funded by the next generation of homeowners who are already facing tougher home ownership conditions than their parents ever did.

The State Government must demonstrate leadership to reform the system and ensure greater transparency, efficiency and accountability to make better use of what is already collected.

Challenge

Developer contributions and delivery of infrastructure

Unfortunately, once developer contributions are made the mechanisms for reporting and oversight for these contributions is substandard.

State Government agencies and local government are responsible for the delivery of infrastructure, however information and reporting on what has been collected, expended and future plans for infrastructure investment is often very limited.

Sometimes this means that home buyers have already paid for amenity in a development but are faced with long waits and developers are powerless to intervene.

Developer contributions that are funded by homeowners shouldn't be subject to any less transparency than any other government functions and the system needs reform.

By better targeting what we need, promoting competition and efficiency, more new homeowners will be able to enjoy a better and more liveable community.

Read the National Housing Finance and Investment Corporation report on the UDIA SA website.
The report states:

Although developer contributions may (in theory) help ensure developers factor in and contribute to the cost of new infrastructure around housing developments, these contributions are typically complex to estimate and costly to administer. If developer contributions are unpredictable, poorly scoped or administered inefficiently, they have the potential to impede new housing supply and unnecessarily increase the cost of new housing.

Recommendations

The UDIA is calling on the incoming state government to commit to the review, identification and improvement of regulatory oversight involving developer contributions and charges.

R1. Enforceable guidelines are implemented so that:

a. Developer contributions are fit for purpose and relate to the development project in question

b. Genuine competition and best pricing principles address monopolistic behaviour.

R2. State and local government agency requirements (including utilities) can be reviewed and contested to ensure that they are not cross subsidising other activities unrelated to the development.

R3. Contributions already collected by state and local government must be reported and audited annually with detailed plans and timeframes for their use.

16. https://www.nhfic.gov.au/research/researchreport/developer-contributions-how-should-we-pay-for-new-local-infrastructure/developer-contributions-how-should-we-pay-for-new-local-infrastructure/

Northridge, Enfield

Invest in open space

A key determinant of liveability in a city is the amount of open space, including its quality and function, as well as the streetscapes and public realm. The best suburbs in Adelaide all boast a powerful combination of these.

Open space requirements are governed by the PDI Act and unfortunately the framework adopted to ensure Adelaide has the best open spaces is simply not delivering on its intention.

The UDIA suggests a comprehensive legislative review is required and that the State Planning Commission consult with the sector and councils on what best suits Adelaide, with a consideration to world's best practice.

How the system works now

The Planning and Development Fund (the Fund) operates under the Planning, Development and Infrastructure Act 2016 (the Act) and provides the means for open space and public realm investment across South Australia.

Monies paid into the Fund are derived from monetary payments in lieu of open space requirements for development involving the division of land into 20 or fewer allotments and also for strata and community titles. The Fund is expended in line with provisions within the Act and is administered by the Office for Design and Architecture SA within the Attorney-General's Department.

Where an application for a development authorisation provides for the division of land into more than 20 allotments, the council in whose area the land is situated may require that up to 12.5% in area of the relevant land area be vested in the council as open space or provide a financial contribution in lieu of the provision open space.

The developer not only provides land for open space but also funds, develops and delivers parks, recreation and infrastructure on this land that is subsequently divested to Council (for example playgrounds, paths and landscaping).

Challenge

Urban infill contributions going to the wrong place for the wrong thing

Each time a property in Greater Adelaide is subdivided, developers are subject to a fee of more than $7,900 per new allotment. This fee, which is passed on to homebuyers, is contributed to the State Government's Planning and Development Fund — funds flagged for investment in open space and public realm. However, where these dollars actually get spent would shock many South Australians.

The current process is outdated and where the funds are spent has no regard for where they derived from.

More often than not, funds are allocated to councils and projects that have the greatest capacity to deliver, rather than the greatest need for investment in amenity and infrastructure, an outcome that is largely the result of the matched funding criteria.

In fact, a large portion of the funds collected from suburban Adelaide are used to fund the State Government's regional projects.

Further, the formula and strategy for what is collected bears no resemblance to what already exists on the ground or is available to residents.

Every dollar contributed by homebuyers to open space should be spent on open space and more of it in the local area from which it was collected; on innovative projects that meet needs and deliver value for communities.

The incoming state government must stop using a dedicated open space fund to address other infrastructure investment or needs, including the redirection to fund the creation and implementation of the new 'Planning and Design Code' — despite the fact the state government collects millions of dollars in fees that should have been used to fund this project.

Challenge

Lack of strategic planning for coordination of open space

Councils should be planning strategically for open space in their area with clear objectives and coordination.

Currently, due to the short-term budget considerations of some councils, developers are requested or forced to make cash payments in lieu of open space.

Further, though inconsistent with the Green Adelaide Regional Landscape Plan and in conflict with creating more sustainable urban environments, instances of developers being instructed by councils to install concrete or hard surfaces rather than sustainable green landscaping so the council can avoid ongoing maintenance costs and obligations when the open space is divested to them, are becoming all too common.

The incoming state government must play a role in ensuring councils develop strategic plans, address the varying standards of open space across council areas, and ensure there is a coordinated approach across the greater metropolitan area.

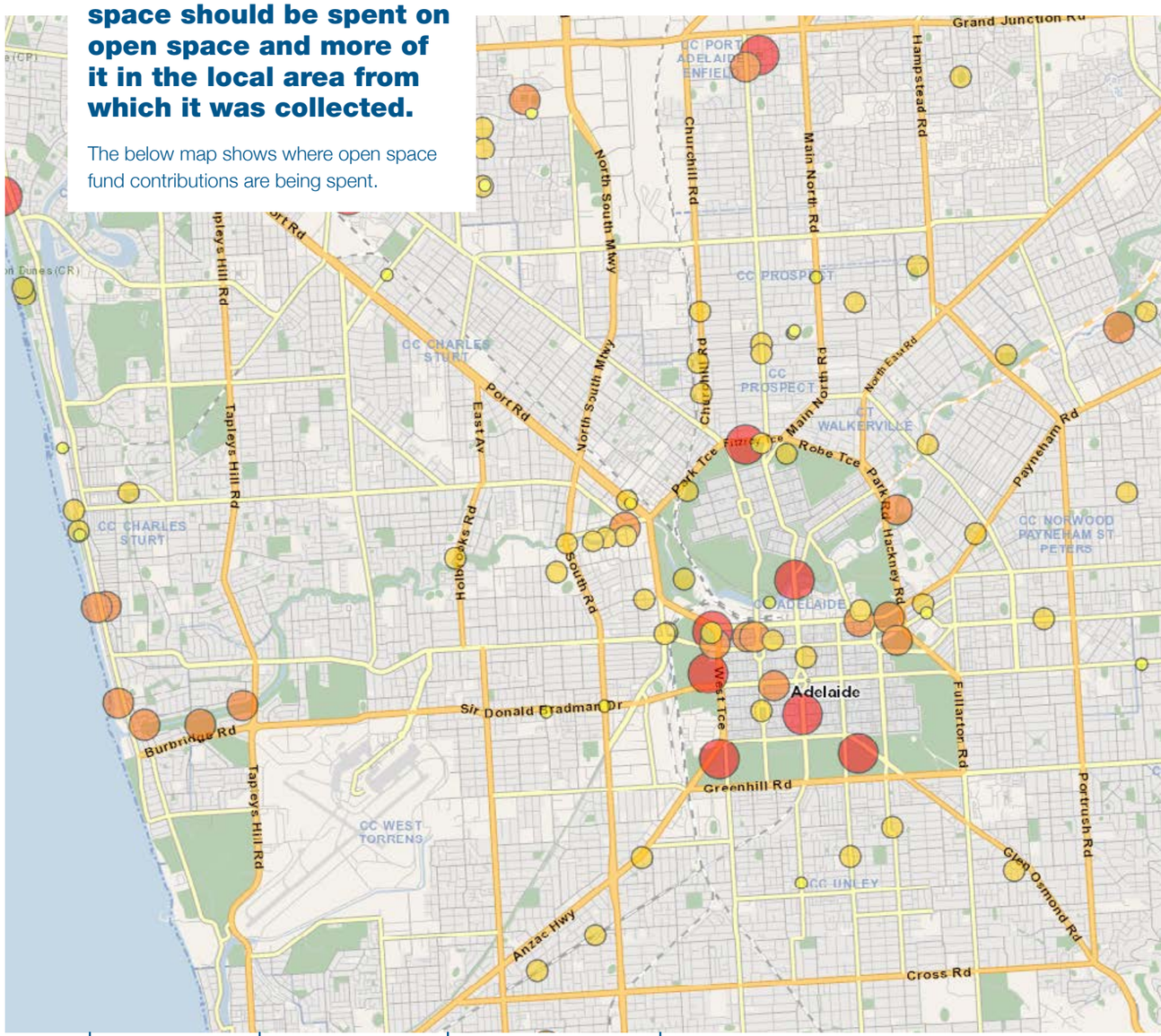
Better planning will benefit residents in the long term and maximise the contributions the developers make through their future investment decisions.

The framework should also provide flexibility to work with developers of large strategic infill sites so that developers can utilise the contributions in that development area, thereby benefiting the new residents and also those who live nearby.

Large strategic infill sites provide exciting opportunities to provide new, innovative and useable open spaces for surrounding residents, and by leveraging the investment by developers, even more can be achieved.

Every dollar contributed by homebuyers to open space should be spent on open space and more of it in the local area from which it was collected.

The below map shows where open space fund contributions are being spent.



Source

location.sa.gov.au

River Torrens Linear Park

Even though Linear Park is a stormwater management space, the River Torrens delivers an important visual amenity, environmental quality, micro-climatic impact and recreational value, regardless of an individual's inability to occupy the water body itself. Quality open spaces such as Linear Park should be considered as prime open space.

Many councils also impose a minimum open space size on the pretence that it is cheaper to maintain a few larger spaces than a larger number of smaller spaces. Sometimes this could resulting in nothing more than dry land grassed areas that are slashed by a ride-on mower twice a year.

The development of smaller areas of open space but to a much higher standard of usability and visual amenity should be our goal, to ensure that a greater number of residents are in closer walking distance to a reserve.

Challenge

Growth areas

In growth areas and larger sub-divisions, the development contribution of 12.5% of open space is often problematic due to the outdated framework.

South Australia needs a contributions system which dedicates open space funds to the area in which they are collected and recognises the contemporary ways in which multipurpose open spaces can provide valuable amenity.

Currently, councils typically discount the contribution value of open space where it has a dual use, for example open spaces with stormwater detention facilities. This is the case notwithstanding there are numerous examples of successful combinations of open spaces and stormwater management throughout metropolitan Adelaide, where storm water infrastructure, such as storm water retention and detention basins, can provide strong local aesthetic amenity, recreation and biodiversity opportunities.

With more innovative and alternative uses recognised as legitimate and desirable uses of open space, not only can our suburbs feature better quality spaces, but also improve housing affordability.

Read the UDIA Submission to Parliament of South Australia Natural Resources Committee for the Inquiry into urban green spaces, on the UDIA website.

The UDIA provided a list of important factors that should be considered how these contributions need to be spent.

Smaller ‘pocket reserves’ can be designed and delivered with sustainable maintenance in mind when considered as part of a broader integrated open space scheme.

Penneys Hill Estate, Hackham

Recommendations

R4. Facilitate better urban amenity and accessibility by committing to reviewing and reforming operation of the Planning and Development Fund and open space contributions to create a fairer, more flexible and effective system that is reflective of contemporary development trends including:

a. The requirement for each council to develop and publish an open space strategic plan outlining the objectives, maintenance and investment plans approved by the state government.

b. State government to develop a metropolitan wide open space plan encompassing each council area.

c. Clear and transparent reporting of all open space contributions made to the Planning and Development Fund and expenditure from it annually by post code.

d. Mechanisms for more contributions made to the open space fund to be accessible for use in the areas collected for a wider range of uses.

e. Repealing parts of the PDI Act to prohibit the use of open space contributions for departmental systems or operational expenditure.

R5. Reviewing and reforming the operation of the PDI Act and regulations to create a fairer, more flexible and effective system reflective of contemporary development trends in new development areas that:

a. Incorporates all open space uses into the 12.5% contribution at 100% value towards that open space contribution, where the land can be demonstrated to have one or more of a revised list of open space values such as those identified earlier.

b. Restricts the ability to impose unreasonable minimum open space areas on individual reserves by recognising within the Planning and Design Code the multiple uses and sizes of reserves required to serve a multitude of functions, where the quality and functional relevance of the space can be demonstrated.

c. Recognises the value of landscaped streetscapes and urban plazas as major contributions to urban amenity which should form part of the contribution towards open space.

Better and more community infrastructure

A key component of successful growth is the provision of infrastructure.

To successfully grow our population and economy, much more work on planning and increased investment for trunk infrastructure, roads, stormwater and public transport is required. Without it, our liveability is at risk.

Challenge

The missing middle of infrastructure

At a local level, developers deliver transport, social and environmental infrastructure, some even provide schools and childcare facilities, retail precincts and medical services — they are rising to the challenge.

State and Federal government partnerships provide much of the major infrastructure such as expressways. For some areas in the north that are booming (much like Angle Vale), it's no surprise the Northern Connector and Northern Expressway have played a crucial part in that.

The biggest challenges we face are what might be described as the 'missing middle of infrastructure'. It's the type of infrastructure joining suburbs and communities together and it has been overlooked.

Currently, developers fund and build vast amounts of infrastructure, while state and local government infrastructure such as connecting roads and schools are frequently lagging — often not built until there is a public outcry or call for it.

The infrastructure challenges we face are symptomatic of an absence of a coordinated vision and the sharing of responsibilities between state and local government — which usually means that no one takes the lead with blame shifted to the development sector.

The PDI Act and other pieces of legislation are deficient in this area, both in the identification and measurement of what is required and the different views of councils about the infrastructure they require.

An added problem is that Infrastructure SA has not made this a key area of focus and is also relying on an under resourced State Planning Commission take the lead.

With more strategic leadership, planning and emphasis on a coordinated approach, the incoming state government can invest in this infrastructure upfront and with more confidence.

King William Road redevelopment

The Northern Expressway and the Northern Connector have been game-changers in terms of developments being able to occur in those areas.

In time, different developments in the north will become connected suburbs and government must take the lead. People in growth areas like the north of Greater Adelaide are no less entitled to access to public transport, good schools and other infrastructure than anyone else.

Read the UDIA 20-Year State Infrastructure Strategy Discussion Paper submission

Challenge

Cost of essential utility infrastructure

Similarly, a corporatised and privatised provision of trunk infrastructure through regulatory regimes that are governed by different legislation does not allow for the best coordination, pricing and efficient delivery of key infrastructure for an innovative urban development.

In addition to state and local government infrastructure, it is critical that we revisit third party access rules for all essential infrastructure. If South Australia is to have a user pays system, it cannot exist in the absence of competitive alternatives to lower costs for developers and ultimately consumers.

A future state government should commit to the bring all these disparate interests together so that efficiencies can be unlocked and more and better infrastructure can be delivered.

Recommendations

B1 Include in the Infrastructure SA charter an increased focus to better recognise the relevance of urban development to the state economy and to consider a suite of infrastructure projects directly aimed at unlocking identified areas for growth.

B2 Create an Urban Futures Infrastructure task force that includes representation from Infrastructure SA, State Planning Commission, state government agencies, local government, utilities and the UDIA to investigate capacity analysis of essential infrastructure in the greater metropolitan areas for both infill and growth areas to unlock areas for growth.

B3 Develop agreed terms of reference for an independent review of competition and pricing mechanisms related to core urban development infrastructure and consider amending third party access arrangements and/or state government guidelines to increase efficiency of infrastructure delivery and improve housing affordability.

B4 Within 12 months of election, review and reform all legislative mechanisms that guide infrastructure access, standards, levels of competition and pricing related to urban development by state and local government.

2019 UDIA Infrastructure Roundtable

As a thought leader on this issue, the UDIA called for a more collaborative and coordinated utility infrastructure delivery strategy for South Australia in its Grow Reform Build platform released in early 2018.

This call was also made in the context of the legislative requirements under the Planning Development and Infrastructure Act that requires the State Planning Commission to report on land supply.

Stop taxing production of housing

The more supply of housing provided, the lower prices are kept and housing affordability is improved. That's why it is important to do all we can to ensure the development process and environment for business is as efficient as possible.

Challenge

Create environment that supports more efficient delivery

Read the UDIA Submission to Parliament of South Australia Natural Resources Committee for the Inquiry into urban green spaces, on the UDIA website.

The UDIA provided a list of important factors that should be considered how these contributions need to be spent.

Along with a myriad of risks and other challenges in the development process, one factor impacting the supply of housing is the imposition of land tax on developers if they hold stock unsold as at 30 June.

Most developers are not long-term landowners that receive rent, however they are treated as such so charges are passed on to home buyers as part of the sale price.

The current system discourages developers from developing large land holdings which can impact supply through certain parts of the year. It means developers are forced to produce smaller stages and stop operating as efficiently as they otherwise could, leading to higher prices. In some cases, it means a total halt to production — the consequence if they don't is to raise prices.

A consumer could end up paying an additional $4,000 as a result — an amount that gets added to the price and generally the value of a mortgage. When one considers that this is borrowed by the homebuyer for the life of their loan, the cumulative effect to that homeowner is massive.

In a report prepared by the South Australian Centre for Economic Studies, an independent analysis was completed around the operation of land tax and impacts on the development sector. The report recognised the issues faced by the development sector and made specific recommendations that land tax exemptions should exist for the development sector.

State government schemes exist in both Queensland and Western Australia recognising this very fact and providing mechanisms to address it. We are calling on an incoming South Australian government to implement a sensible reform that does not discourage the production of new housing.

Recommendation

B5 The UDIA calls on a new state government to introduce land tax exemptions for recently created titles held by developers as trading stock that remain unsold as at 30 June.

Recommendation Summary

Grow

G1	Create and fund a cross-government task force led by the State Planning Commission with representation from the building and development sector to develop a new housing affordability and ownership action plan.
G2	Allocate responsibility and accountability for housing affordability and liveability across all government ministerial portfolios.
G3	Incorporate a Housing Affordability and Sustainability Impact Statement into all relevant Cabinet submissions to ensure cost impacts of new policies on consumers are minimised.
G4	Implement a continuing requirement for a State Government review of the cost impact of all policy decisions on construction and development standards.
G5	Create focus on housing affordability and ownership by considering appropriate amendments to the Planning Development and Infrastructure Act 2016 and associated regulations.
G6	Commit to an investigation of economic reform for the provision of housing in South Australia including: a. The development of a regulatory impact statement on all fees, charges and regulations related to the provision of housing b. A transitionary pathway to reducing reliance on inefficient taxes and charges c. Options for the deferral of up-front taxes and charges for consumers to improve affordability d. Immediately abolishing stamp duty on all new residential, owner occupier, off the plan housing construction below the median house price to improve affordability and increase housing supply.
G7	Commit to a moratorium on new value capture taxes and charges.
G8	Commit to a moratorium on new or changed inclusionary zoning policies without engagement and agreement of the development sector.
G9	Invest in the development of a new real time electronic urban development monitoring tool in partnership with the UDIA, to improve state-wide planning for growth, liveability and affordability, and encourage increased private sector investment.
G10	Develop a new 30-Year Plan for Greater Adelaide[17] by establishing a tripartite (local and state government and private developer) task group to develop terms of reference and coordinated with infrastructure capacity (see recommendation B1).
G11	Implement recommendations provided to the State Government and State Planning Commission in response to the recent Environment and Food Production Area review and in particular: a. Ensure Regional Plans for Greater Adelaide is premised on multiple scenarios and builds in appropriate growth opportunities in locations which are sought by the market. b. Address the over reliance in housing supply of single dwelling subdivisions and instead proactively and urgently increase land supply in market responsive locations including greenfield and large-scale brownfield areas.
G12	Independently review the operation and effectiveness of the new PlanSA e-Planning system and its impact on affordability through consultation with the development sector, councils, and utilities.

17 Referred to regional plans under the PDI Act.

Recommendation Summary

Reform

R1	Enforceable guidelines are implemented so that: a. Developer contributions are fit for purpose and relate to the development project in question b. Genuine competition and best pricing principles address monopolistic behaviour.
R2	State and local government agency requirements (including utilities) can be reviewed and contested to ensure that they are not cross subsidising other activities unrelated to the development.
R3	Contributions already collected by state and local government must be reported and audited annually with detailed plans and timeframes for their use.
R4	Facilitate better urban amenity and accessibility by committing to reviewing and reforming operation of the Planning and Development Fund and open space contributions to create a fairer, more flexible and effective system that is reflective of contemporary development trends including: a. The requirement for each council to develop and publish an open space strategic plan outlining the objectives, maintenance and investment plans approved by the state government. b. State government to develop a metropolitan wide open space plan encompassing each council area. c. Clear and transparent reporting of all open space contributions made to the Planning and Development Fund and expenditure from it annually by post code. d. Mechanisms for more contributions made to the open space fund to be accessible for use in the areas collected for a wider range of uses. e. Repealing parts of the PDI Act to prohibit the use of open space contributions for departmental systems or operational expenditure.
R5	Reviewing and reforming the operation of the PDI Act and regulations to create a fairer, more flexible and effective system reflective of contemporary development trends in new development areas that: a. Incorporates all open space uses into the 12.5% contribution at 100% value towards that open space contribution, where the land can be demonstrated to have one or more of a revised list of open space values such as those identified earlier. b. Restricts the ability to impose unreasonable minimum open space areas on individual reserves by recognising within the Planning and Design Code the multiple uses and sizes of reserves required to serve a multitude of functions, where the quality and functional relevance of the space can be demonstrated. c. Recognises the value of landscaped streetscapes and urban plazas as major contributions to urban amenity which should form part of the contribution towards open space.

Recommendation Summary

Build

B1	Include in the Infrastructure SA charter an increased focus to better recognise the relevance of urban development to the state economy and to consider a suite of infrastructure projects directly aimed at unlocking identified areas for growth.
B2	Create an Urban Futures Infrastructure task force that includes representation from Infrastructure SA, State Planning Commission, state government agencies, local government, utilities and the UDIA to investigate capacity analysis of essential infrastructure in the greater metropolitan areas for both infill and growth areas to unlock areas for growth.
B3	Develop agreed terms of reference for an independent review of competition and pricing mechanisms related to core urban development infrastructure and consider amending third party access arrangements and/or state government guidelines to increase efficiency of infrastructure delivery and improve housing affordability.
B4	Within 12 months of election, review and reform all legislative mechanisms that guide infrastructure access, standards, levels of competition and pricing related to urban development by state and local government.
B5	The UDIA calls on a new state government to introduce land tax exemptions for recently created titles held by developers as trading stock that remain unsold as at 30 June.

Sources

Page	Source	Source Link
14	sa.gov.au	*https://www.sa.gov.au/topics/planning-and-property/researching-a-property/median-house-sales-by-quarter*
15	sa.gov.au	*https://www.sa.gov.au/topics/planning-and-property/researching-a-property/median-house-sales-by-quarter*
15	Australian Government Productivity Commission Industry report — First Home Ownership, March 2004	*https://www.pc.gov.au/inquiries/completed/first-home-ownership/report/housing.pdf* chapter 1, page 3
17	2021 Demographia International Housing Affordability	*http://www.demographia.com/dhi.pdf*
17	CoreLogic	*https://news.anz.com/content/dam/news/articles/2021/November/ANZ_CoreLogic_Housing_Affordability_Report_2021_Final_lr.pdf*
19	2021–22 State Budget	*https://www.statebudget.sa.gov.au/budget-papers/2021-22-Budget-Statement.pdf*
23	Grattan Institute	*https://grattan.edu.au/wp-content/uploads/2018/03/901-Housing-affordability.pdf*
26/27/28	Land Supply Report for Greater Adelaide, Plan SA	*https://plan.sa.gov.au/state_snapshot/land_supply/land_supply_reports_for_greater_Adelaide*
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16 December 2022

Expert Panel
GPO Box 1815
Adelaide SA 5001

Dear Expert Panel Members,

Re: Planning System Implementation Review

Thank you for providing the Urban Development Institute of Australia SA (UDIA) with the opportunity to respond to the Expert Panel conducting the Planning Reform Implementation Review.

In addition to the deputation submission previously made, please find attached a full submission addressing questions of the panel and discussion paper topics. This includes a summary of *Key Recommendations* which we believe are the most critical and essential matters that must be addressed with a sense of urgency to address the current housing crisis. Further information can also be found in submissions previously made by the UDIA to the State Planning Commission (attached).

Since the expert panel review of the planning system in 2012, the subsequent introduction of the *Planning Development and Infrastructure* (PDI) *Act 2016* and the implementation of the new electronic Planning and Design Code, many significant and important enhancements have been made to ensure our state's planning system is modern, user friendly and a solid foundation for adaptive and flexible policy and assessment.

While there are many areas for improvement, we do not believe that the system is "broken" nor requires extensive changes, particularly as it relates to the interface between authorities, proponents and the community.

We do however firmly believe there is a critical imperative to consider the broader objectives in totality because without doing so, a number of the technical and detailed questions posed could conceivably result in a series of suggestions and policies that would seem worthwhile when considered in isolation, but in the broader context could have more wide-ranging unintended consequences. It is only when considering the wider context and the broader goal or "problem to be fixed" can the best solutions be identified.

While many of the Planning System Implementation Review discussion points consider the delivery of the new system, the UDIA notes that the terms of reference and much public discourse often refers to strategic planning policy and directions. We are pleased that the Expert Panel has recognised this and invited a broad range of matters where it states in the first discussion paper, "…the Panel is, of course, interested to hear about all ideas for reform that may benefit the South Australian community and encourages you to raise any matters that have not otherwise been canvassed in this Discussion Paper".

As outlined in previous UDIA submissions to the State Government and most recently in the UDIA's **Grow.Reform.Build**. document published prior to the 2022 State Election, as a membership body we are uniquely placed to see and experience first-hand what South Australian's value most about the places they live.

We also see and experience each of the different and competing interests of policy makers, agencies and levels of government, and how they are often at odds with each other. From a state-wide perspective, we see that without necessary and thorough planning, development can adversely change the character of our existing suburbs and streets. We see the impacts of a lack of investment in public transport, roads and trunk infrastructure and how this neglect can quickly lead to the same congestion and 'growing pains' being experienced interstate.

The UDIA believes that a key focus for our state now and into the future should be for South Australia to continue and unquestionably be the place where people can still achieve the great Australian dream.

Home ownership means different things to different people — for some it is in a compact denser neighborhood or apartment, for others it is a place where you can have a trampoline, trailer and a dog.

For those that can't afford to invest in purchasing a home, the certainty that comes with knowing a place to rent is affordable and available, in an area that they are attached to or familiar with, can make a significant difference to their overall wellbeing.

We know that a place to call home offers an undeniable sense of safety, security, and stability — a fundamental human need as defined in Maslow's Hierarchy of Needs — and is a proven pathway to intergenerational prosperity.

We hope that these key objectives continue to remain in the forefront of the Expert Panel's considerations.

Yours sincerely,

Pat Gerace
CHIEF EXECUTIVE

KEY RECOMMENDATIONS

Land Supply

The UDIA seeks to ensure there is a pipeline of development-ready land and has concerns relating to inadequacies in existing land supply measurements.

Our comments regarding the current framework are:

- Schedule 4(1) and section 7 of the Planning, Development and Infrastructure Act (PDI) obligates the State Planning Commission to review land supply at least once every five years and we believe the five-year review period is too infrequent.
- Land supply issues combined with changing economic circumstances have caused a housing affordability crisis and these factors make the timeframe for reviews more urgent.
- Land supply and "development ready" land reports do not adequately factor in critical delivery elements such as infrastructure delivery, approval process delays and the political decision-making process.
- The current monitoring of land supply is inefficient, and the Urban Development Institute of Australia (UDIA) proposes a different model (currently under development in conjunction with National Housing Finance and Investment Corporation).

A substantial amount of information on this matter is included in the UDIA submission to the State Planning Commission on the review of the Environment and Food Production Area (attached).

Infrastructure Coordination

All of society benefits from new infrastructure. Even those far away from a new piece of major transport infrastructure may indirectly benefit, while those living, working, or investing in close proximity benefit both directly and indirectly.

- The early identification and adequate scoping of urban infrastructure is lacking
- The UDIA believes the cause is that no single or appropriate authority has been tasked with the early planning and scoping of urban infrastructure for growth areas.
- The infrastructure challenges are caused by an absence of a coordinated vision and the sharing of responsibilities between state and local government
- A lack of Government control leads to blame and responsibility being novated to the development sector
- The PDI Act and other pieces of legislation are deficient in this area, both in the identification and measurement of what is required and the different views of councils about the infrastructure they require.
- Infrastructure SA has not made this a key area of focus and is also relying on an under-resourced State Planning Commission to take the lead
- Corporatised and privatised delivery of trunk infrastructure through regulatory regimes that are governed by different legislation does not presently allow for the best coordination, pricing and efficient delivery of key infrastructure for an innovative urban development.

In the absence of a coordinated comprehensive government owned and regulated infrastructure delivery system it is appropriate that we revisit third party access rules for all essential infrastructure. If South Australia is to have a user pays system, it cannot exist in the absence of competitive alternatives to lower costs for developers and ultimately consumers.

The UDIA believes that the state government should commit to bringing all disparate interests together so that efficiencies can be unlocked and more and improved infrastructure can be delivered. The UDIA suggests:

- Include in the Infrastructure SA charter an increased focus to better recognise the relevance of urban development to the state economy and to consider a suite of infrastructure projects directly aimed at unlocking identified areas for growth.
- Create an Urban Futures Infrastructure task force comprising representation from Infrastructure SA, State Planning Commission, state government agencies, local government, utilities and the UDIA to investigate capacity analysis of essential infrastructure in the greater metropolitan areas for both infill and growth areas to unlock areas for growth.
- Develop agreed terms of reference for an independent review of competition and pricing mechanisms related to core urban development infrastructure and consider amending third party access arrangements and/or state government guidelines to increase efficiency of infrastructure delivery and improve housing affordability.

Infrastructure Schemes

The UDIA played a key role in the impetus for a new alternative in the PDI Act for the apportionment of infrastructure costs in new development areas with multiple landowners.

- UDIA's suggested provisions for infrastructure schemes and a Scheme Coordinator did not get adopted in the drafting of the PDI Act
- The UDIA strongly advocates for a Scheme Coordinator to manage infrastructure schemes and be involved in the early identification and scoping of urban infrastructure for growth areas
- The Scheme Coordinator would be a nominated person with a strong charter to be measured against to ensure appropriate performance, together with appropriate support staff and authority to resolve negotiations with other state or local government authorities, service authorities, developers and landowners.
- The UDIA suggests better planning through Infrastructure SA and a taskforce, enforceable guidelines for developer contributions, up-front funding and use of a Scheme Coordinator for infrastructure schemes to begin resolving infrastructure delivery issues within South Australia.
- A detailed UDIA submission in relation to infrastructure schemes operation and the use of development deeds was made in the recent investigation conducted by Deloitte on behalf of Planning and Land Use Services (PLUS) (attached)[1]

New 30 Year Plan

- UDIA recommends that the new 30-Year Plan for Greater Adelaide be developed by establishing a tripartite (local and state government and private developer) task group to develop terms of reference and coordinated with infrastructure capacity

[1] *UDIA Submission on Developer Deed Review and Infrastructure Schemes, 2022*

- The UDIA strongly supports the continued supply of master planned neighbourhood-type zones which provide the necessary flexibility for developments to evolve and respond to the housing market.
- UDIA's position is that strategic infill is a preferable way to increase housing density and diversity over general infill.
- The new 30-Year Plan should identify more large-scale strategic infill projects and work to unlock medium to higher density projects in appropriate areas.
- Strategic infill provides optimum opportunity to master plan the regeneration of areas, better infrastructure co-ordination and urban outcomes
- The UDIA continues to call for improved and more detailed planning, based on better data and an understanding of what people need and value, and how the market is likely to respond.
- Well planned redevelopment with scale will be more sustainable and can include open space and opportunities to upgrade infrastructure.
- The UDIA does not support the inclusion of infill-type policies (that are used to address higher densities in existing suburbs) in master planned areas as it unnecessary and counterproductive to good urban outcomes where innovation and the benefit of master planning can achieve even better outcomes
- The 30-Year Plan and PDI Act should address housing affordability by acknowledging and addressing the hidden cost of land and housing imposed by taxation, regulatory charges and development delays.

Role of Urban Infill

- UDIA believes that without necessary and thorough planning, ad-hoc general infill development can adversely change the character of our existing suburbs and streets and note that much of the public discussion and policy questions raised in this review relates almost entirely to general infill.
- The UDIA believes that the impact of all potential policy recommendations resulting from this should be accompanied by a commensurate consideration and action to increase alternative land and housing supply measures.
- The UDIA believes there should be a reduction in general infill development and refocus on strategic infill in identified sites and this should be carried out together with a more realistic appraisal of the development ready pipeline for major greenfield developments
- Modelling should investigate what significant reductions in general infill will mean as the Government recognises considerations such as character and heritage areas, increases in rates of tree retention, and reduction of on-street parking.
- The Planning and Development Fund expenditure should be reflective and commensurate to where the contributions are coming from, so that a fairer system is in place to spend the money where it is needed. Clear and transparent reporting of all open space contributions made to the Planning and Development Fund and expenditure from it should be made annually by post code.

Development Assessment and Planning and Design Code Improvements

- A number of suggestions have recently been provided to PLUS as part of 'Miscellaneous Technical Enhancement Code Amendment' (MTECA). This submission is attached for reference.[2]
- One of the continuing concerns most often voiced by the sector is the matter of referrals and the power of 'Direction' afforded to referral agencies effectively making them a 'quasi' planning authority with the power to veto any determination of the relevant authority.
- Each agency effectively acts as a separate authority, requiring multiple approvals from multiple authorities for the one development application. The power of 'Direction' also provides significant power to agencies to 'leverage' their authority to achieve outcomes beyond the purview of the referral.
- One example are referrals related to the Environment Protection Authority (EPA). We reiterate our previous concerns that site contamination policy suite 'front loads' the assessment of site contamination to require considerable cost and delay before planning consent is issued. The UDIA seeks that Practice Direction 14's referral trigger (and potentially the regulations) put that requirement as a condition at the 'back end' once planning consent has been granted.
- Other referrals and Planning and Design Code matters requiring attention are Native Vegetation Clearances, Code Amendments and the application of Affordable Housing Overlays
- The dysfunction of these referrals and the nature of the process adds cost, reduces efficiency, and does not improve the outcomes for affordability, native vegetation etc.

[2] *UDIA Submission to the State Planning Commission on Miscellaneous Technical Enhancement Code Amendment (MTECA)*

Table of Contents

KEY RECOMMENDATIONS *3*

1. Planning and Development Legislation *8*

2. Urban Infill Policy *27*

3. Planning System Delivery and Operation *37*

4. Appendix *42*

1. Planning and Development Legislation

1.1. Land Supply [3]

The UDIA believes that there should be and adequate pipeline of development ready land and have concerns relating to inadequacies in existing land supply measurements.

Schedule 4 of the PDI Act identifies the obligations of the Minister for Planning ('Minister') and the State Planning Commission ('Commission') to set performance targets in relation to any goal, policy or objective under a state planning policy or planning agreement. Based on the current aspirations and targets of the state planning policies and of the 30-Year Plan for Greater Adelaide, there is faculty to review the available land supply across *Greater Adelaide*, and to subsequently implement changes to accommodate population growth, and respond to housing choice and affordability.

Schedule 4(1) of the PDI Act, obligates the Commission to review, at least once every 5 years, the housing and land supply targets outlined in the state planning policies.

These are coupled with the land supply review requirements applicable to Environment and Food Production Areas under section 7 of the PDI Act.

The five-year review period is simply too infrequent. Through our observations, this is, and will continue to be, a foundational issue to the inadequacies in land supply across Greater Adelaide and prolong the housing affordability crisis.

Land supply issues and lack of affordable housing has been further exacerbated over recent years by the sharp changes in economic, social and environmental influences (national and global). In our opinion, this further exposes the lethargy of the review process and lack of legislative responsiveness. We are also of the understanding that the Commission is inadequately resourced (including dedicated staff and independent research capability), for what is arguably one of the most important roles of the State.

We also suggest that the current land supply reviews rely upon population forecasts and land use patterns across Greater Adelaide as a whole, rather than assessing sub-regions of Greater Adelaide or specific markets. We have previously raised concerns about the use of Land Supply Reports and the assumptions underpinning the reports. Whilst it is pleasing that the assumptions are in the process of being revised, the approach of assessing land supply holistically (i.e., across the entire Greater Adelaide regions) as compared to a sub-regional level remains highly problematic.

Modelling should account for a reduction in general infill to reflect more character / heritage areas, more tree retention, reduction in on-street parking loses etc. The realistic rate of development of major land developments should also be factored into the assumptions. While an area may have over 15 years' land supply, development on the ground will take far longer due to the lengthy process of making allotments 'development ready'. Furthermore, the delivery of land in known supply pipelines can be compromised by delays in Code Amendments / approvals processes / political decisions / government infrastructure coordination. A further reduction in yield should be applied to address these factors.

Rather than shaping Adelaide in the most appropriate way to take account of new trends in living patterns or addressing affordability to maintain Adelaide's livability, it appears the reports have significant weight in the decision process for rezoning land. Incorrect assertions about excess land supply have too often been used as a reason for constraining or preventing new housing development because of the government's reluctance to invest in infrastructure, which unfortunately is at the expense of the primary driver in maintaining housing affordability, namely competitive market tension.

[3] U*DIA Submission on Land Supply Reports and State Planning Commission EFPA review.*

We note that Section 6 of the PDI Act makes provision for the Minister to establish a sub-region (including within Greater Adelaide). We are of the strong opinion that sub-regions should be established otherwise Greater Adelaide as a planning region will continue to under deliver upon the long-term strategic land supply and housing needs, based on outdated assumptions. Without the establishment of sub-regions within Greater Adelaide, South Australia will continue to face a great hurdle in being able to quickly respond to affordability challenges in the future — challenges already being experienced in many parts of Greater Adelaide.

The UDIA has been very clear that it does not support the inclusion of the Environment and Food Protection Areas within legislation. The framework is flawed and designed so that there would never be any changes. To our knowledge there has been no scientific and objective analysis of the current boundary as it relates to soil types, average rainfall, agricultural yields, or native vegetation which one could reasonably expect would be considered when implementing such a restriction. As a result, we are now faced with a situation where the supply of land and affordability of housing in certain areas is at a very significant risk as a result.

We recommend the Government devise and implement a dynamic housing demand and supply monitoring program using live data and reporting publicly on a quarterly basis in conjunction with the UDIA. This, in conjunction with the ability to amend growth boundaries for specific regions, sub-regions and townships on an as-needs basis, is the key to unlocking land supply and addressing the affordability crisis.

The UDIA strongly supports strategic infill within metropolitan Adelaide, as distinct from general infill. It is general infill which has caused considerable community angst and been a principal driver behind the Commission's implementation of overly onerous planning guidelines for infill development.

Alternative forms of infill development need to be considered in order to support housing diversity and choice and support the delivery of affordable housing. Generally, such should primarily remain within the realm of strategic infill, as we are of the view that master planned developments provide the best opportunity to manage issues of sensitivity to the community.

Identifying future infill development opportunities should be a key responsibility of the State Planning Commission, ensuring a strategic lens is applied. Many Councils are not undertaking strategic planning which has forced proponents to lead Code Amendments in order to unlock identified opportunities.

The UDIA submit that the current numerous impediments to rezoning land for strategic infill need to be addressed, as this is limiting the delivery of alternate and affordable housing forms.

1.2. Infrastructure[4]

1.1.1 Infrastructure Planning

The UDIA believes that the state government should commit to bringing all disparate interests together so that efficiencies can be unlocked and more and better infrastructure can be delivered.

All of society benefits from new infrastructure. Even those far away from a new piece of major transport infrastructure may indirectly benefit, while those living, working, or investing in close proximity benefit both directly and indirectly.

[4] *UDIA Submission on Developer Deed Review and Infrastructure Schemes, 2022*

- The early identification and adequate scoping of urban infrastructure is lacking
- The UDIA believes the cause is that no single or appropriate authority has been tasked with the early planning and scoping of urban infrastructure for growth areas.
- The infrastructure challenges are caused by an absence of a coordinated vision and the sharing of responsibilities between state and local government
- A lack of Government control leads to blame and responsibility being novated to the development sector
- The PDI Act and other pieces of legislation are deficient in this area, both in the identification and measurement of what is required and the different views of councils about the infrastructure they require.
- Infrastructure SA has not made this a key area of focus and is also relying on an under-resourced State Planning Commission to take the lead
- Corporatised and privatised delivery of trunk infrastructure through regulatory regimes that are governed by different legislation does not presently allow for the best coordination, pricing and efficient delivery of key infrastructure for an innovative urban development.

In the absence of a coordinated comprehensive government owned and regulated infrastructure delivery system it is appropriate that we revisit third party access rules for all essential infrastructure. If South Australia is to have a user pays system, it cannot exist in the absence of competitive alternatives to lower costs for developers and ultimately consumers.

The UDIA believes that the state government should commit to bringing all disparate interests together so that efficiencies can be unlocked and more and improved infrastructure can be delivered. The UDIA suggests:

1. Include in the Infrastructure SA charter an increased focus to better recognise the relevance of urban development to the state economy and to consider a suite of infrastructure projects directly aimed at unlocking identified areas for growth.
2. Create an Urban Futures Infrastructure task force comprising representation from Infrastructure SA, State Planning Commission, state government agencies, local government, utilities and the UDIA to investigate capacity analysis of essential infrastructure in the greater metropolitan areas for both infill and growth areas to unlock areas for growth.
3. Develop agreed terms of reference for an independent review of competition and pricing mechanisms related to core urban development infrastructure and consider amending third party access arrangements and/or state government guidelines to increase efficiency of infrastructure delivery and improve housing affordability.

1.2.2 Infrastructure Schemes

Developer contributions require enforceable guidelines so that contributions are fit for purpose, fair and relate to the development project in question. The process and expenditure must be clear and transparent, reviewed, reported and audited.

Various infrastructure funding models including value capture, infrastructure levies and the mechanics of developer contributions can have an effect on housing affordability and the first home buyer in new developments. Infrastructure levies / developer contributions are ultimately a tax on the first home buyer in new developments (costs are generally transferred from developer to purchasers), with other taxes compounding (e.g., stamp duty). Increases, mismanagement or over-pricing of these levies/contributions strikes at the heart of affordability for new home buyers.

The UDIA played a key role in the impetus for a new alternative in the PDI Act for the apportionment of infrastructure costs in new development areas with multiple landowners. Unfortunately, during creation/drafting of the PDI Act, and subsequent legislative amendments, much of the UDIA's suggested provisions for infrastructure schemes and a Scheme Coordinator, were watered down due to political pressure from other interest groups that were vehemently opposed to any form of developer or landowner contributions.

The UDIA does not believe that any wholesale reform is required, rather the knowledge and real-life experience gained in past developments such as at Mt Barker can be used to modestly refine the methodology for infrastructure deeds with more successful outcomes.

The early identification and adequate scoping of urban infrastructure is sadly still lacking. The UDIA believes this is largely because no single or appropriate authority has been tasked with the early planning and scoping of urban infrastructure for growth areas.

A detailed UDIA submission in relation to infrastructure schemes operation and the use of development deeds was made in the recent investigation conducted by Deloitte on behalf of Planning and Land Use Services (PLUS) (attached)[5]

The UDIA strongly advocates for a Scheme Coordinator to manage infrastructure schemes and be involved in the early identification and scoping of urban infrastructure for growth areas. The Scheme Coordinator would be a nominated person with a strong charter that they could be measured against to ensure appropriate performance, together with appropriate support staff and authority to be able to resolve negotiations with other State or Local Government authorities, service authorities and developers/landowners.

Despite having the largest balance sheet and ability to source funds at cheaper rates then other parties, there has been a reluctance for Government to fund infrastructure up front. Having no up-front capital or funding to commence the construction of infrastructure is impractical and inefficient as it results in the need to wait for the receipt of development contributions to then fund infrastructure.

Investment in infrastructure needs to be made up-front, with the developer contributions to follow later. The timing and outlay of infrastructure can still be managed appropriately so it is completed sensibly and efficiently. Early creation of infrastructure unlocks greater development potential, which generally translates into earlier receipt of developer contributions from more active development.

It is important for SA to have a range of tools available to manage developer contributions and infrastructure delivery. For instance, for very large Government land parcels specific negotiated indentures can be the most effective, as was used for projects like Mawson Lakes or Golden Grove. For growth areas with multiple land holdings and infrastructure traversing across the various land holdings, the infrastructure deeds can be effective when set-up and managed appropriately. Infrastructure schemes envisaged by the UDIA could also be effective. For smaller, simpler projects an individual Council Separate Rate could be the most efficient method.

The establishment of Joint Planning Boards under section 36 of the PDI Act and the use of the *Urban Renewal Act 1995* are other options to consider.

1.2.4 Vesting of open space and roads

The present planning system enables councils to control, block or take leverage over land division developments by withholding consent to the vesting of roads and open space, including in circumstances

[5] *UDIA Submission on Developer Deed Review and Infrastructure Schemes, 2022*

where the council is not the relevant planning authority for the development.

The PDI Act contains a number of provisions relating to applications for the division of land and associated matters such as the provision of land for open space purposes (and/or a monetary contribution in lieu of the provision of open space land).

These provisions of the PDI Act have been relied upon by certain councils to frustrate developments by refusing to consent to the vesting of roads and open space, or only consenting to the vesting upon particular conditions.

Various assertions have been made about the operation of these provisions, including that:

- councils retain absolute discretion about whether or not to accept the vesting of roads and open space, and on what terms;
- the decision on vesting is to be made independently to the grant of planning consent and land division consent;
- the decision on vesting may be a decision capable of being exercised by the elected members, or other arms of a council than its Assessment Panel and planning staff, taking the decision outside of the planning system altogether;
- the decision on vesting is largely unconstrained by the Planning and Design Code or any particular planning policies or objectives;
- the State Planning Commission (and SCAP as its delegate) lacks the power to ultimately determine the configuration of roads and open space in a land division for which it is the relevant authority; and
- the decision on vesting may not be appealable to the ERD Court and the ERD Court may lack the jurisdiction to determine the issue in the course of a planning appeal.

Issues relating to vesting are being experienced by a number of developers and appear to be increasingly utilised by councils. In some cases, there are real concerns that the provisions are being used for ulterior purposes.

The interpretation being adopted by some councils fundamentally undermines the ability of a relevant authority (including Council or Regional Assessment Panels, SCAP, the Minister and potentially the ERD Court) to determine land division applications.

This has led to circumstances where a relevant authority (such as SCAP) has granted planning consent, upon, amongst other things, being satisfied with the provision of open space, only for a council to purport to decline to have the open space vested in the council. Councils are taking the position that by declining to consent to the vesting of open space (and other land) they are capable of frustrating the planning consent granted by the relevant authority.

This interpretation has the potential effect of rendering the planning decision of the relevant authority futile pending the attitude of the council to the proposed development.

The issue is capable of being fixed through relatively simple amendments to sections 102 and 198 of the PDI Act.

1.2.5 Model Bonding Agreements

Bonding Agreements and Infrastructure Agreements with councils are commonly used by developers to secure the release of new certificates of title in a land division before the associated civil works are fully complete. However, the process of negotiating Bonding Agreements can in itself be a source of

additional cost and delay for developments. It is not uncommon to see councils seek to require that developers continue to maintain public reserves well after a development is completed.

For well over 20 years the planning system in South Australia has provided the ability for the Minister to publish a model bonding agreement for use by developers and councils across the State. That power, which is currently found in Regulation 87(3) of the PDI (General) Regulations has never been acted upon.

The UDIA would support discussion around the creation of a model bonding agreement for use across the sector.

Infrastructure Schemes

1. What do you see as barriers in establishing an infrastructure scheme under the PDI Act?

   A key barrier to establishing an infrastructure scheme is that they require up-front funding in order to ensure the early provision of infrastructure. The current system does not provide any certainty when key infrastructure will be delivered, noting that the responsibility for delivery often includes developers, state agencies and Councils.

2. What improvements would you like to see to the infrastructure scheme provisions in the PDI Act?

   A Scheme Coordinator is essential to the delivery of infrastructure schemes. A Scheme Coordinator would act as a facilitator and final arbiter of the terms of agreement for infrastructure schemes for recommendation to the relevant Minister.

   The Act could also be amended to formally require strategic urban infrastructure planning to be undertaken and integrated with Regional Plans and preferably at a Sub-regional level. Timeframes for delivery need to be identified and reinforced. Such provides greater stakeholder certainty and confidence in the planning process.

   Ultimately, the Government needs to find a way to ensure the up-front funding is available to build infrastructure, with the receipts from developer contributions to follow. The establishment of a State Fund and associated provisions around the use and allocation of this fund, together with a model for developer contributions should be explored.

3. Are there alternative mechanisms to the infrastructure schemes that facilitate growth and development with well-coordinated and efficiently delivered essential infrastructure?

   There are numerous successful examples of infrastructure agreements being established through a traditional deed and associated land management agreement. The schemes in place at Two Wells and Roseworthy are good examples. Such are examples where:

   - Infrastructure investigations were comprehensive;
   - Trigger points for infrastructure provision were clearly established;
   - A funding mechanism was established;
   - A third-party managing authority was established;
   - Responsibilities for infrastructure provision were clearly identified;
   - A dispute resolution process was established with provision for an independent expert to make determination.

1.3 New 30-Year Plan for Adelaide (Regional Plans)

The UDIA strongly believes that the new 30-Year Plan for Greater Adelaide must be developed by establishing a tripartite (local and state government and private developer) task group to develop terms of reference and coordinated with infrastructure capacity.

Regional Plans and any Sub-regions should be premised on multiple scenarios and build in appropriate growth opportunities in locations which are sought by the market. They must address the over reliance in housing supply of single dwelling subdivisions and instead proactively and urgently increase land supply in market responsive locations including greenfield and large-scale brownfield areas.

It is the UDIA's position that strategic infill is preferred over general infill as this provides optimum opportunity to master plan the regeneration of areas, resulting in better infrastructure co-ordination and development outcomes. Such can assist in optimising the urban tree canopy, on-street car parking provision and the like.

A new 30-Year Plan could recognise more large-scale strategic infill projects and work to unlock medium to higher density projects in appropriate areas. Better planned and more sustainable developments can include open space and provide for suitable infrastructure upgrades. Similarly, there should be a more strategic commitment to revitalising the City of Adelaide with more residents.

The 30-Year Plan and PDI Act must address housing affordability. Our housing market is the third least affordable nationally — falling behind Brisbane and Perth. The two largest contributors to this problem from a state perspective is the failure to plan for growth and the hidden cost of land and housing.

The major reason for diminishing affordability is the hidden cost of land and housing imposed by taxation, regulatory charges and development delays which reduce feasibility and increase the purchase price. Historical underinvestment by State and local governments is funded by the next generation of homeowners who are already facing tougher home ownership conditions than their parents ever did. There must be a continuing requirement for a State Government review of the cost impact of all policy decisions on construction and development standards. The Government must create focus on housing affordability and ownership by considering appropriate amendments to the PDI Act and associated regulations.

There is opportunity for Regional Plans and Sub-regions to consider open space planning with consideration to the areas that are experiencing high degrees of infill but have inadequate public open space. The Planning and Development Fund expenditure should be reflective and commensurate to where the contributions are coming from, so that a fairer system is in place to spend the money where it is needed and in the suburbs from which it has been collected. Clear and transparent reporting of all open space contributions made to the Planning and Development Fund and expenditure from it should be made annually by post code.

The new Regional Plans should be dynamic and consider various growth scenarios so that they can adapt to market conditions and changing environments. Housing affordability must be a key priority.

Strategic Planning

1. What are the best mechanisms for ensuring good strategic alignment between regional plans and how the policies of the Code are applied spatially?

   Regional plans are by nature a high-level strategic document, whereas the zones applied through the Code are at a more refined level.

One step to ensure greater strategic alignment would be for sub-regional plans to be established which would provide a higher level of detail as compared to the Regional Plan.

Within identified growth areas, there is a potential need for Structure Plans and/or Concept Plans to be established in order to:

- identify key infrastructure obligations which are either planned or required;
- facilitate improved infrastructure planning by all stakeholders, including utility providers and Councils;
- provide greater understanding and confidence to all stakeholders in respect to infrastructure provision;
- reduce reservations associated with the rezoning of land to accommodate future growth.

Infrastructure co-ordination is also a key issue in respect to infill development. Stormwater infrastructure, typically the responsibility of Councils, is a frequent impediment to infill development as there has been an underinvestment in assets over many years.

A critical element for the success of our recommendation is the adequate resourcing and commitment to implement the relevant infrastructure.

2. What should the different roles and responsibilities of State and local government and the private sector be in undertaking strategic planning?

Under the Development Act, Councils were responsible for preparing Strategic Directions Reports which aimed to ensure that local Development Plans aligned with the Regional Plan.

This obligation did not carry through into the new system, in essence due to the introduction of the Code, where the State Planning Commission is responsible for its preparation and maintenance - s.65(2). This is coupled with the Commissions responsibility for the establishment of the various Planning Instruments as prescribed in Part 2, Division 2 of the PDI Act.

As a consequence of the above, legislatively Councils have no apparent obligation to undertake strategic planning. This presents an issue given Councils are the owner of key assets which support urban growth, including but not limited to roads, public open space and stormwater networks. This creates a disconnect between land use planning and infrastructure planning.

We note that the Act makes provision for Joint Planning Agreements to be entered into. A Joint Planning Board can also be established in conjunction with any such Agreement.

We see this as a potential tool to manage planning at a sub-regional level, for the key purpose of improving the integration between regional planning strategy, infrastructure provision and the spatial application of the Code.

We understand that Joint Planning Agreements and associated Joint Planning Boards are not mandatory. Consideration could be given to formalize such a process where sub-regions and associated joint planning agreements and boards are required to be established.

We see this as a model to enforce improved infrastructure planning and integration with land use planning.

A key to the success of such a model would be for all relevant infrastructure providers such as SA Water (water and sewer) and DIT (roads) to be a party of the Joint Planning Agreements.

In earlier responses we noted the benefit of appointing an Infrastructure Scheme Co-ordinator for the delivery of infrastructure schemes. Such a role could be expanded as an Infrastructure Co-ordinator with broader powers to interface with any Joint Planning Agreement/Joint Planning Board arrangements.

The above are all recommendations to assist with improved infrastructure planning.

The UDIA considers that the private sector needs to retain a key role in the procurement and delivery of infrastructure. The sector is often able to deliver infrastructure faster and cheaper than the relevant agencies.

There is much merit in allowing developers to deliver the key infrastructure on their land parcel. It is attractive to developers to be able to construct key infrastructure in advance of a later delivery date by the relevant authority. However, the developer should be appropriately reimbursed for taking on the associated procurement and finance risks.

Early concept designs for infrastructure are required to allow this to happen. But early concept designs should be undertaken early in any case to enable appropriate calculation of costs of infrastructure, securing of finance, scheduling for implementation and fair apportionment of development contributions.

Contestability of all infrastructure works should be a requirement, to encourage the private sector to deliver infrastructure on a competitive bid basis.

1.4 Development Assessment

As part of the Phase 3 Submissions to the Draft Code, the UDIA raised concerns that under the PDI Act, there are a total of 24 Referral Triggers and 22 of these allow Referral Agencies to have the power of 'Direction' (i.e., the Agency can direct a decision (refusal)). There are two (2) referral triggers under the new system where the Agency can only provide advice to the Relevant Authority who must have 'Regard' to this advice.

The UDIA supports the changes made under the PDI Act that comments of Referral Agencies must be contained to 'matters for which a referral was made' and the referral Agency will be accountable to defend an appeal against a decision directed by that Agency.

Whilst we support the Referral Authority limiting their comments to matters for which the referral was made and we support referral authorities being accountable to defend determinations that have been directed by that authority, we reiterate our concerned regarding the 'veto' power of Referral Authorities that have the power of 'Direction.'

The UDIA takes this opportunity to again express concern in relation to the power of 'Direction' afforded to referral Agencies effectively make an Agency a 'quasi' planning authority with the power to veto any determination of the Relevant Authority. Each Agency effectively act as a separate authority – effectively requiring multiple approvals from multiple authorities for the one development application. The power of 'Direction' also provides significant power to Agencies to 'leverage' their authority to achieve outcomes beyond the purview of the referral.

To challenge a referral Agency would also involve considerable time (6-12 months) and money ($50K-$100K) for an applicant to initiate an appeal through the Courts. In most cases, this time and cost imposition would be beyond the threshold of feasibility of most development projects which would limit

the real opportunity for an applicant to appeal and overturn a determination of a Referral Agency. Further, an applicant appealing to the

Environment Resource and Development (ERD) Court would be challenging the weight of evidence and authority of a State Agency, which is likely to also limit an applicant's appetite to seek a successful resolution through the courts.

The UDIA recommend an amendment such that referrals allow for a Regard comment as opposed to mandatory Direction. If the status quo remains, then the assessment process will become cumbersome and compromised. If the planning authority does not follow the comments made by the referral agency, then the application could be sent to SCAP for concurrence, similar to the previous *Development Regulations 2008* requirements for State Heritage matters in Schedule 8 of the Development Regulations.

Ultimately it should be for the planning authority to balance the competing interests that arise between a developer, the community and government agencies.

Where a referral agency has a power of direction the exercise of the direction should occur as a 'one stop shop' avoiding the need for further approvals.

Where separate approvals are required under other legislation, an applicant should have the ability to defer those matters for later assessment.

Environment Protection Authority Referrals

The UDIA have made several detailed submissions in the past in relation to the State Planning Commission regarding site contamination policies, current wording of Practice Direction 14 and associated referral to the EPA.

The resolution of site contamination issues is rarely a question of 'if' and more often a question of 'how' (e.g. by what practical remediation solutions). Site contamination issues will rarely if ever go to the heart of whether planning consent should be granted, but has the propensity to delay that process dramatically. The urban development industry needs a nimble and cost-effect process for dealing with site contamination so as to turn land over quickly to meet the growing demand for housing in the State.

The UDIA believes that site contamination remediation can generate both public and private benefits by releasing previously contaminated land and facilitating urban regeneration which can result in significant economic, environmental and social benefits.

Site contamination is a complex and broad issue impacting large areas of land across the State, and the planning system is only one part of the Government's integrated approach to the management of site contamination However, as it stands, many people wanting to rejuvenate land are often subject to lengthy and onerous remediation processes.

We reiterate our previous concerns that the current site contamination policy suite 'front loads' the assessment of site contamination resulting in considerable cost and delay before planning consent is issued. Applicants will variously need to spend in the order of $5,000 on a "Preliminary Site Investigation (PSI)" report, $20,000-$200,000 on a "Detailed Site investigation" (DSI) and $20,000-$150,000 on an audit before knowing that they have a consent. The delay in undertaking a DSI (even without an audit) can be many months, sometimes a year. Assuming (again, without accepting that it should be part of the planning system) that an assessment is warranted, this level of integration should occur only once planning consent is in hand.

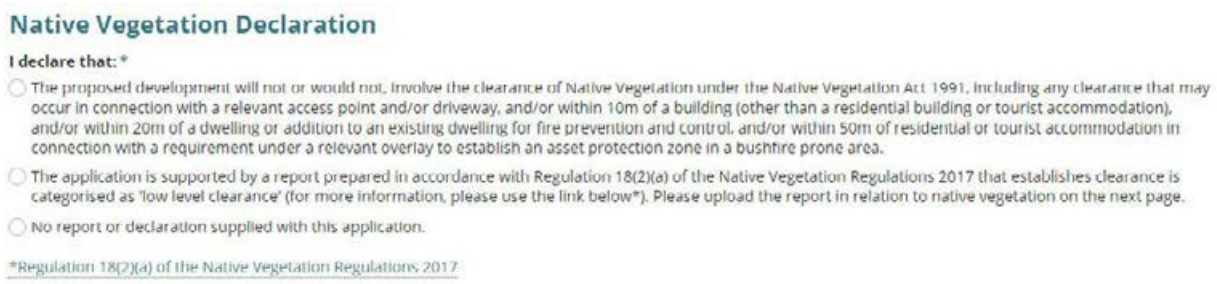
The UDIA seeks that Practice Direction 14's referral trigger (and potentially the regulations) put this requirement as a planning condition at the 'back end' once planning consent has been granted.

This could for example be achieved through the Reserved Matter power under section 102(4) of the PDI Act.

Native Vegetation

The UDIA agrees with the Expert Panel that the introduction of the 'Native Vegetation Overlay' and the 'State Significant Native Vegetation Overlay' has strengthened the retention of native vegetation on development sites.

However, there is a disconnect when lodging a Development Application on a site that is located within the Native Vegetation Overlay, as the Development Application Processing System (DAP) requires you to select from the following three options:



It is recommended that the DAP system be modified to enable a fourth option that allows you to nominate that:

> "*A report has been prepared and identifies that moderate/major clearance of native vegetation is proposed, but is supported.* "

The 'fact sheet' for Native Vegetation on the PlanSA Website also does not provide a definition for 'low level clearance' which would therefore require an expert's opinion. It is recommended that a clear definition for 'low level clearance' be provided to support the streamlined processing of applications and a clear guidance to applicants. As it currently stands, most applicants do not possess the necessary expertise to confidently or accurately make the above declarations and applicants are therefore required to engage expert vegetation consultants to assist them in this process at considerable expense. Providing further guidance and clarity to applicants as part of detailed fact sheets may assist in reducing time and cost delays associated with the need to engage native vegetation consultants.

The UDIA would support investment in technology that enables identification of the location of native vegetation without the requirement to obtain expert consultant advice to lodge a development application. This information should be readily publicly available (i.e. via a layer on SAPPA).

In instances where applications trigger referral under the relevant Overlays, there is also still a requirement for the applicant to undergo a separate assessment and approval process under the 'Native Vegetation Act.' Applications that trigger referral should result in a combined planning consent and native vegetation approval to reduce 'red tape' and expedite the overall combined approval processes.

Code Amendments

When the PDI Act was introduced the UDIA supported placing the emphasis on consulting on changes to the planning rules upfront and then (once adopted) allowing landowners to exercise their private property rights in accordance with the rules. Since the implementation of Phase 3 of the Code, UDIA Members have advised the Proponent Initiate Code Amendment system has unlocked underutilized land

to be rezoned generally to address critical housing supply shortages and demand for changing land uses in a particular area.

The UDIA continue to advocate that emphasis should be placed on consultation occurring at the Code Amendment stage to enable a streamlined development assessment process for land uses that are expressly envisaged within the (once adopted) zone, without time delays and costs that may be occurred via third party appeal rights to challenge decisions made against that policy once it has been set and determined. The UDIA supports the State Planning Commission ('the Commission') guiding principles of the Engagement Charter being namely that if an application meets all the prescriptive rules and the land use is envisaged, that the application should receive a streamlined and assured approval without notification and third-party intervention.

Affordable Housing overlays

In the UDIA's submission for the Miscellaneous Technical Enhancement Code Amendment (MTECA) we raised concerns in relation to draft wording from the South Australian Housing Authority (SAHA) in the Affordable Housing Overlay referral trigger as drafted below. Our concerns were that this wording would result in all applications proposing 20 or more dwellings or residential allotments being referred to the Minister.

Current drafting in MTE Code Amendment:

> "*Except where the applicant for the development is the South Australian Housing Authority (or an agent acting on behalf of the South Australian Housing Authority), residential development or land division other than land division that reflects the site boundaries illustrated and approved in an operative or existing development authorisation for residential development under the Development Act 1993 or Planning, Development and Infrastructure Act 2016):*
>
> *a) that comprises 20 or more dwellings or residential allotments and the development is intending to provide affordable housing; or*
>
> *b) where the applicant is seeking to access one or more of the planning concessions outlined in the Affordable Housing Overlay DTS 3.1, 3.2 or 4.1; or*
>
> *c) that is described in the application documentation as including affordable housing of any number of dwellings or residential allotments."*

We reiterate the UDIA's strong support for the MTECA wording as drafted for consultation that the proponent must demonstrate an intent to provide affordable housing or be seeking to access one of more of the planning concessions to trigger a referral to the Minister. However, we would like to take this opportunity to again express our concern that the adopted wording remains vague and subject to interpretation especially the phrase 'seeking to access' which may be construed by a Relevant Authority as an automatic trigger for referral of the application (to the Minister responsible for administering the *South Australian Housing Trust Act 1995*). We again seek that the wording in the Affordable Housing Overlay referral trigger be amended to the following:

Suggested wording:

> "*Except where the applicant for the development is the South Australian Housing Authority (or an agent acting on behalf of the South Australian Housing Authority), residential development or land division (other than land division that reflects the site boundaries illustrated and approved in an operative or existing development authorisations for residential development under the Development Act 1993 or Planning, Development and Infrastructure Act 2016):*

a) *that comprises 20 or more dwellings or residential allotments and is described in the application documentation as intending to provide affordable housing; or*

b) *that is described in the application documentation as intending to provide affordable housing and the applicant is seeking to access one or more of the planning concessions outlined in the Affordable Housing Overlay DTS 3.1, 3.2 or 4.1; or*

c) *that is described in the application documentation as intending to including affordable housing for any number of dwellings or residential allotments*."

Public Notifications and Appeals

1. What type of applications are currently not notified that you think should be notified?

Generally, UDIA members consider the triggers for notification to be very robust. However, in some circumstances, applications are notified even where the type of development proposed is expressly envisaged in a zone. A wider review to identify these discrepancies is encouraged, and preferably a switch back to the listing only the types of development that should be notified rather than the current model which only lists forms of development that do not need to be notified (we expand on this point further below).

2. What type of applications are currently notified that you think should not be notified?

As part of the UDIA SA's submissions to Phase 2 and Phase 3 of the Code, we outlined that where a land use is envisaged and reasonable in its design and aligned with the performance outcomes of the Zone, an application should not be subject to public notification.

A example of this is where a land use 'element' is listed in a Zone's DPF 1.1 (i.e. it is an envisaged land use), it is not always listed as being 'excluded' from public notification in Table 5 of the Zone (even though it is listed as being an envisaged land use). Public notification should not be required for land uses identified in DPF1.1 of a Zone.

The UDIA SA raised concern during the Phase 2 and Phase 3 consultation periods that the approach of 'specifying types of development being excluded from public notification" would most likely result in more types of applications going on public notification, even if there are lengthy lists of development that are excluded.

UDIA Members experience has proven this to be the case, where departures to garage/dwelling wall lengths on boundaries have triggered public notification even if the element of non-conformance is minimal. This has sometimes led to protracted assessment timeframes where notification has resulted in public submissions who wish to be heard at the relevant Council Assessment Panel meeting.

Another example relates to 'Neighbourhood Type Zones' where a community facility, educational establishment or preschool which exceeds 1 building level requires public notice, even where the zone expressly anticipate dwellings of two building levels (which are excluded from public notice).

It is recommended that the structure of the notification triggers be flipped so that all forms of development are 'excluded' from notification other than specifically identified type of development which are then listed in the Procedural Matters (PM)- Notification table within each Zone. Only those specifically identified types of development would then be required to undergo notification

within the Zone, such as where development exceeds the specified building height or is clearly an unsuitable land use within in a zone.

3. What, if any, difficulties have you experienced as a consequence of the notification requirements in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.

UDIA Members have expressed concern in deciphering 'Column B' (exceptions) of Table 5 – Procedural Matters – Notification. In order to determine if a land use outlined in 'Column A' as being 'excluded' from notification is actually not excluded from notification (note the double negative i.e. the land use actually is required to be notified) members are required to either open two versions of the Code on their screens or to scroll back and forth between the DTS/DPF provisions and Table 5. For example:

Class of Development (Column A)	Exceptions (Column B)
Any development involving any of the following (or any combination of any of the following): (f) dwelling	Except development that: 1. Exceeds the maximum building height specified in…..DTS/DPF 2.1
Alternation of or addition to any of the following (or of any combination of any of the following): (a) community facility (b) educational establishment (c) pre-school	Except for development that does not satisfy… DTS.DPF 1.6

User experience has raised concern with the time and complexity involved in order to determine if an application will require public notice. This could be rectified by a formatting change where the DTS/DPF referenced is listed in Column B.

4. What, if any, difficulties have you experienced as a consequence of the pathways for appeal in the Code? Please advise the Panel of your experience and provide evidence to demonstrate how you were adversely affected.

The UDIA supported the previous Expert Panel on Planning Reform's December 2014 'The Planning System We Want' recommendation that there is a focus shift to setting clear directions and policies up front and encourage communities to be involved when their participation is most meaningful during the Code Amendment (rezoning process). In members experience, the community consultation undertaken as part of the Code Amendment process provides meaningful engagement on zoning and policy framework to adjoining property owners/occupants.

The current level of appeals being limited only to applicants rather than third parties assists in streamlining the application and avoids vexatious litigants.

5. Is an alternative planning review mechanism required? If so, what might that mechanism be (i.e. merit or process driven) and what principles should be considered in establishing that process (i.e. cost)?

The current planning review mechanisms enables an aggrieved applicant to either have a review of an Assessment Manager's Decision to the relevant Assessment Panel (Council, Regional or Commission) or directly to the ERD Court. Under the PDI Act, the relevant Assessment Panels are (with the exception of one (1) elected member) comprised of Accredited Professions to a Level 2 standard. This ensures a review by a Panel (i.e. CAP) is being undertaken by a panel who have the expertise and experience to hear and considers such matters. In addition, the existing ERD Court system has suitably qualified and experienced Commissioners. The UDIA support the existing review and appeal avenues without further need for yet another administrative review 'tribunal.'

The UDIA would however support a more streamlined ERD Court process, particularly in relation to the timeframe taken for planning appeals to be determined. It is not uncommon for planning appeals to take over a year to be determined, with the parties waiting up to 8 months to receive judgment following a hearing. This delay, in combination with the expense of the process has meant that the ERD Court is not readily available as an avenue to resolve an impasse with a relevant authority, for applicants and residents alike.

Despite having three full time Commissioners and a number of allocated Judges the ERD Court has, as at 13 December, published just 17 judgments in 2022. Of these only a handful are 'planning appeals'. It is apparent that a large amount of time is being spent on a relatively small number of matters.

There are clear opportunities to reform the ERD Court processes to make it a more accessible and efficient part of the overall system. These could include empowering the Court to take a more active role in refining the issues in dispute (avoiding every element of a development being considered) or legislating a timeframe for delivery of judgments.

Accredited Professionals

1. Is there an expectation that only planning certifiers assess applications for planning consent and only building certifiers assess applications for building consent?
2. What would be the advantages of only planning certifiers issuing planning consent? What would be the disadvantages?
3. Would there be any adverse effects to Building Accredited Professionals if they were no longer permitted to assess applications for planning consent?

UDIA members have expressed there is some time benefits to enabling Building Accredited Professions to assess some applications for planning consents (akin to the former 'Residential Code' scheme under the rescinded *Development Act 1993*). Time efficiencies can be gained by the Building Certifier being able to issue a combined Planning Consent and Building Consent thereby fast-tracking approvals for developments that 'tick the box.' As such the UDIA supports the current accredited professional framework that enables building certifies to assess certain classes of development for planning consent (such as Deemed-to Satisfy) forms of development.

Impact Assessed Development

1. What are the implications of the determination of an Impact Assessed (Declared) Development being subject to a whole-of- Government process?

   Ensuring and maintaining transparency and accountability in public decision making is strongly supported by the UDIA. Whilst streamlining assessment processes is fundamental to ensuring the timely delivery of critical housing products, for more significant 'major projects' our members recognised the importance of ensuring all Ministers that may be impacted by a project (i.e. infrastructure, economic development, environment etc) are able to review and comment on a proposal to ensure the best outcome for all South Australians. The UDIA recognize and support the Expert's Panel suggesting of re-introducing a Cabinet Review Process for 'Impact Assessed (Declared)' forms of development as recommended by the Select Committee of Parliament's inquiry into the Kangaroo Island Port application as an appropriate mechanism to ensure the appropriate level of scrutiny for State significant forms of development. This should be appropriately balanced however to ensure that developments are expedited and not needlessly complicated or delayed.

Deemed Consents

2. Do you feel the deemed consent provisions under the PDI Act are effective?
3. Are you supportive of any of the proposed alternative options to deemed consent provided in this Discussion Paper? If not, why not? If yes, which alternative (s) do you consider would be most effective?

   The UDIA in its 'Grow, Reform Build' blueprint identifies creating 'an efficient planning and approval mechanisms to minimise 'red tape' as being essential to the urban development sector. Accordingly, the UDIA support the Expert Panel's suggestion of a 'Deemed Approval' in instances where an applicant has received both planning and building consents for an application, but the relevant authority (Council) has either delayed or refused to issue the final development approval.

   Members would also strongly support the Expert Panel's suggestion of enabling (by way of a Regulation amendment) an accredited professional to issue the final development approval. This would avoid 'double handling' by relevant authorities (i.e. Council) and delays associated with the administrative issue of another Decision Notification Form onto the PlanSA system. Given the accredited professions (building) needs to ensure consistency between planning and building consents, it logically follows that once both planning and building consents have been granted Development Approval could then also be granted by the accredited professional.

   Members have identified that whilst the current 'Deemed Consent' mechanism is supported, it is mainly used as a 'last resort' to obtain a decision from the relevant authority who has exceeded their statutory timeframes. There is a perception of 'maintaining working relationships' with officers at the relevant authority (i.e. Council) and this may lead to a reluctance within the sector to issue Deemed Consent notices. Concern is also raised that the current 'deemed consent' function does not 'commence' until a development application has been 'verified' under Regulation 53(2) by the relevant authority. It is recommended that a review of the verification timeframes together with Deemed consents process is undertaken to ensure the combined verification and assessment process is undertaken as expediently as possible.

   Relevant authorities retain the ability to appeal against a Deemed Consent notice and there are no consequences for a relevant authority where this occurs. The UDIA considers that where a relevant authority appeals against a Deemed Consent notice and is unsuccessful in overturning the Deemed Consent it should be required to pay the costs of the applicant who has suffered unnecessary delay through the actions of a relevant authority.

Verification of development applications

1. What are the primary reasons for the delay in verification of an application?

As outlined in the UDIA SA's submission to Phase 3 of the Planning and Design Code, currently the Verification Process (5 business days) that occurs at the beginning of every development application has no express consequence attached should the planning authority not undertake this verification process within the 5 day timeframe. During the Phase 3 P&D Code Consultation UDIA SA raised concern that the planning authorities may take longer to verify applications and where verification is delayed, the lodgment and assessment process will not have officially commenced, meaning it is not possible for the applicant to instigate the Deemed to Consent process. This effectively leaves applications 'in limbo'.

This concern has unfortunately become a reality since the implementation of the Code with a large percentage of relevant authorities failing to verify applications with in the 5 business day period. Experience from UDIA members concur with the anecdotal evidence sited by the Expert Panel that a lack appropriate resourcing by relevant authorities leads to delays in the verification process, with no consequence for the relevant authority and no means for an applicant to rectify the delay.

The UDIA is aware that there is currently no University within South Australia that provides an Undergraduate Planning degree. The only pathway into the profession within South Australia is via the Master of Urban and Regional Planning at the University of South Australia, which was postponed in the previous two years due to the Covid-19 pandemic and only recommenced at the start of 2022. The lack of new qualified town planners entering the profession, combined with those leaving the profession (either via retirement or moving to alternative career pathways) has resulted in a critical shortage of qualified planning staff to administer the system.

The UDIA SA would strongly encourage the State Government to work with the Universities to provide greater career pathways options into the planning profession in order to accommodate the staffing requirements of relevant authorities to expedite the assessment system. Funds collected by the CITB could potentially be used to improve the quality and accessibility of training provided to the planning profession.

UDIA SA members have also cited unrealistic and unjustified request for information and documentation outside the information required under Schedule 8 of the PDI (General) Regulations from relevant authorities during the 'verification' period. There is a view (rightly or wrongly) that these requests during verification are a 'workload management' tactic, used to delay lodgment and 'stop the clock' on the process to give the relevant authority more time. Alternatively some relevant authorities are requesting an extensive list of possible items anticipated by Schedule 8 without reference given the limited scope expressed by Regulation 31.

Such examples of unjustified requests for documentation during verification include:

- Request for software details of a carpark free space 'loop' calculator which was essentially a 'box' that was located with a landscaped area which otherwise would not constitute 'development' if not associated with the signage;
- Details of anticipated waste volumes for a childcare centre;
- Details of estimated time it will take a waste vehicle to collected bins from a childcare centre and the footpath waste contractors would utilise to wheel bins from enclosure to the collection vehicle;

- Details of the mature height of landscape plan species to be shown on the landscape schedule;
- Requests for added notations on elevations regarding the height of obscure glazing to manage privacy concerns;
- Requesting a DRAINS model and MUSIC model in addition to the provided stormwater management plan; and
- Clarifications of traffic generation rate used in expert consultant's traffic assessment report.

Given the above examples, the UDIA would strongly support the Expert Panel's suggestion of amending the Schedule 8 – Plans and documentation requirements required for verification.

UDIA Members have also raised verification delays in instances where there is debate as to whether Council or SCAP is the relevant authority (i.e. a new application to very an application previously issued by SCAP). In such instances when an application is submitted, the DAP system only enables the selection of the relevant Council as the 'relevant' authority. Council then has to manually re-assigned the application to SCAP as part of the verification process. This would be overcome if the DAP system allowed 'SCAP' to be directly selected as a relevant authority.

2. Should there be consequences on a relevant authority if it fails to verify an application within the prescribed timeframe?

It is considered that if planning authorities do not meet the Verification timeframe, then the Assessment Process timeframe must commence, and the fees are not payable. It is understood that this would require an amendment to the Regulations. The wording in Regulation 53 (2) regarding payment of fees will need to be taken into consideration. At present there appears to be a gap in the overall process between Regulations 31 and 53 which needs addressing.

Other options that could be considered include self-verification or ERD Court costs penalties where it is necessary for the Court to determine or direct the verification decision.

3. Is there a particular type or class of application that seems to always take longer than the prescribed timeframe to verify?
4. What would or could assist in ensuring that verification occurs within the prescribed timeframe?
5. Would there be advantages in amending the scope of Schedule 8 of the PDI Regulations?

Reserved Matters

In the UDIA's submission for the Miscellaneous Technical Enhancement Code Amendment (MTECA) we highlighted recommended improvements in relation to Section 102(3)-(5) of the PDI Act which enshrines the power for some matters relating to the assessment of a proposed development to be reserved for later assessment:

"(3) A relevant authority may, in relation to granting a planning consent, on its own initiative or on application, reserve its decision on a specified matter or reserve its decision to grant a planning consent—

(a) until further assessment of the relevant development under this Act; or

(b) until further assessment or consideration of the proposed development under another Act; or

(c) until a licence, permission, consent, approval, authorisation, certificate or other authority is granted, or not granted (by the decision of another authority), under another Act.

(4) A relevant authority must allow any matter specified by the Planning and Design Code for the purposes of this subsection to be reserved on the application of the applicant.

(5) Any matter that is not fundamental to the nature of the relevant development may, subject to the Planning and Design Code, be reserved under subsection (3) or (4)."

We take this opportunity to reiterate that the ability for an applicant to nominate certain matters which are not fundamental to the question of whether Planning Consent can be granted is potentially of great utility. It does not avoid assessment of those matters but rather enables an applicant to obtain a decision on whether Planning Consent is warranted without incurring unnecessary costs on matters which are not fundamental to that decision.

The applicant, not the Relevant Authority, bears the risk that the reserved matters cannot ultimately be achieved for some reason. The planning system contemplates that the Code will specify certain matters which an applicant may request to be reserved for later assessment.

We confirm the matters which in our opinion would be suitable to be included in the Code for the purposes of section 102(4) of the PDI Act include:

• Site Contamination;

• Stormwater;

• Wastewater disposal;

• Landscaping;

• Native Vegetation clearance; and

• Final materials and finishes.

Obviously there will be times when an applicant wishes to include matters like landscaping and final finishes in the initial application in order to demonstrate the merits of a development. There will be other times when those matters have little bearing on the decision to grant or refuse Planning Consent.

On this basis, we again recommend that an amendment to Table 2 of Part 5 of the Code to specify that the above matters are matters that an applicant may request to be reserved for later assessment.

We also take this opportunity to highlight that the current DAP system does not currently have the functionality to enable applicants to upload information to address reserved matters and/or conditions of consent. It is recommended that the DAP enhancement be included to enable a more streamlined and trackable post-approval functionality.

OTHER

Response to requests for Further Information

- When an applicant responding to a Request for Information (RFI) from the relevant authority on the DAP system, the application remains 'on hold' until such a time that the relevant authority

confirms whether or not the applicant has sufficiently resolved the RFI content. UDIA Members understand that this is a 'loophole' that some Councils use because there are no assessment timers to manage this process. Often it appears to be caused by Council's planners awaiting to hear back from their engineers or other internal departments. This can result in an applicant's response to an RFI being uploaded but not being 'confirmed' by the relevant authority for several weeks (during which the assessment clock has stopped), adding to delays in assessment that are not picked up by the DAP system clocks. The UDIA recommended that the DAP system be modified so that the relevant have five (5) business days to confirm whether the applicant has sufficiently addressed the RFI once a response has been submitted before the application returns to be 'live.'

Shared Access to Applications on DAP system

- The UDIA support the use of technology to enhance the accessibility of the planning system for all members of the urban development industry. Members have identified the current DAP system provides access to one entity who then must share access with others (i.e. project team) who often will need to access requests for further information, stamped approved plans, decision notices etc. A recommended future enhancement of the DAP System should enable greater flexibility for project team members to access application information without the reliance of the submitter to 'share' the application with them.

2. Urban Infill Policy

The UDIA recognises the benefits of a consistent set of planning policies established through the Planning and Design Code for the development sector.

As stated in the Panel's report, South Australia's infill policy is new, and the outcomes are yet to be fully realised. We recognise that infill development has been a key policy area of reform given the significant community interest in this issue.

Master planned developments must be treated differently from general infill given the opportunities to coordinate and plan in a way that delivers liveability, sustainability and to provide for the range of housing our community needs.

While the overall planning outcomes may be consistent for infill and greenfield development, the tools available to achieve master planned developments are much broader as they are not constrained by compatibility with existing character, road networks, open space provision or an existing public realm.

The UDIA strongly supports the continued supply of master planned neighbourhood-type zones which provide the necessary flexibility for developments to evolve and respond to the housing market. We do not support however, the inclusion of infill-type policies in these master planned areas.

Design Guidelines

1. Do you think the existing design guidelines for infill development are sufficient? Why or why not?

   The UDIA recognises that infill development policies need to carefully balance the existing neighbourhood characteristics and constraints with the community's desire for a range of housing. Significant design policies have been included in the Planning and Design Code to address this

balance. Given that dwellings considered under the HomeBuilder Scheme were not assessed against these new policies, insufficient time has passed to test their effectiveness. The UDIA therefore recommends further monitoring of the impacts on development potential, availability of housing stock and design outcomes before making further changes.

In relation to design manuals to support the Code, the UDIA is concerned that this adds another layer of complexity to the planning system overall and provides uncertainty around the role of these documents. Guidelines and design manuals should be seen as advisory rather than policy. Where it is policy, it should be within the Code.

2. Do you think there would be benefit in exploring alternative forms of infill development? If not, why not? If yes, what types of infill development do you think would be suitable in South Australia?

The UDIA supports the Code facilitating a range of infill development types that meets the housing needs of South Australians. It is for this reason that it is important that a performance-based approach to planning is maintained within the legislation and the Code.

The policies must enable innovative and creative housing solutions and not continue to fall back on a tick box approach to planning in a way that stops good projects from happening. We advocate for clear and certain policies with streamlined assessment pathways where codification is possible. However, there must always be the option of a performance based assessment to support unique circumstances and innovative opportunities.

In strategic infill sites, it is critical that there is a high level of flexibility to ensure we can make the most of these sites and provide for housing diversity.

In particular, we would like to see the quantitative standards of the Code reviewed for larger strategic infill sites where there is a higher propensity to resolve all of the design concerns expressed in respect of small-scale infill. This is the opportunity for new and innovative housing led by the development sector. A method of achieving this might be through consideration of dispensation for significant development sites.

Car Parking Policy
Code Policy

1. What are the specific car parking challenges that you are experiencing in your locality? Is this street specific and if so, can you please advise what street and suburb.

For residential development within master planned developments, car parking can be balanced between on-site and off-site provision. The rigid application of residential car parking rates in these areas can stifle innovation, make it difficult to create small-lot housing products and impact on housing affordability.

A more flexible assessment approach to car parking for Greenfields or strategic infill is recommended to enable a greater diversity of housing stock where there is greater opportunity to consider a range of parking solutions.

2. Should car parking rates be spatially applied based on proximity to the CBD, employment centres and/or public transport corridors? If not, why not? If yes, how do you think this could be effectively applied?

There are some key areas where there are a unique range of factors guiding car parking numbers and it is reasonable to have differing car parking rates, for example:

- Master planned development should have more flexible rates than small-scale infill
- Parking is not required in the CBD where public transport is accessible
- Strategic employment areas could be more flexible where there is shared parking.

These could be specifically identified through a Car Parking Overlay within the Code. The current approach is to exclude areas through Transport, Access and Parking Table 2 from the general standards. However, this is more difficult to find and interpret when navigating the Code.

3. Should the Code offer greater car parking rate dispensation based on proximity to public transport or employment centres? If not, why not? If yes, what level of dispensation do you think is appropriate?

Car parking numbers within the Code are generalised figures based on high level analysis to broadly address car parking concerns. A performance-based planning system is designed to enable alternatives to the numerical assessment standard where a lesser amount is proposed.

There are many circumstances where a reduced car parking rate can be justified. For example where there is available shared parking, on-street parking, access to public transport, high level of walkability or the other strategic outcomes are prioritized.

4. What are the implications of reviewing carparking rates against contemporary data (2021 Census and ABS data), with a focus on only meeting average expected demand rather than peak demand?

5. Is it still necessary for the Code to seek the provision of at least one (1) covered carpark when two (2) on-site car parks are required?

We note that the draft Code for consultation required that only one (1) car park needed to be provided for two-bedroom homes.

Car ownership data (using the vehicle registration system and information from the Australian Bureau of Statistics) demonstrated that this would be sufficient, as 2016 statistics indicated that the highest proportion of households owned one (1) or no cars (42 per cent) and approximately 35 per cent of the population owned two (2) cars.

However, in response to feedback from the public and councils during consultation on Phase Three of the Code, the car parking rates were increased to provide at least two (2) car parks for two-bedroom infill housing, increased from one (1) car park originally proposed. The Code also required at least one (1) of those car parks to be covered (e.g., carport or garage).

The UDIA considers that greater flexibility should be applied to small lot housing in master planned communities and would welcome the opportunity to work with the Commission on how a more flexible policy position could be developed.

The requirement for undercover car parking to be provided should be reviewed having regard to the propensity for garages to be used as storage spaces instead of car parks.

Design Guidelines

1. What are the implications of developing a design guideline or fact sheet related to off-street car parking?

   Provided that the role of the fact sheet or design guideline is clear as advisory, it may be useful to provide clarity around car parking layout and design. However, it is not an issue raised by our membership as a significant priority.

Electric Vehicles

1. EV charging stations are not specifically identified as a form of development in the PDI Act. Should this change, or should the installation of EV charging stations remain unregulated, thereby allowing installation in any location?

   There is a need for flexibility in the planning system as the EV industry is emerging and it is expected the EV market will adapt to technology as the industry grows.

   EV prevalence as well as the use of solar power and batteries will ultimately change sustainability requirements of development and alter people's movement and choices (at home and at work).

   While EV charging stations are currently not identified as a form of development in the PDI Act, the effect of making EV charging stations development may make it more difficult to deliver them.

   If EV charging stations are substantial, they do have the potential to become a change of use within the current system. If this occurs, they will be assessed against the general provisions of the Planning and Design Code.

   Currently there are a number of private providers of EV charging stations such as 'Jolt' that provide free charging but incorporate an advertising display into the charging station (i.e. the advertising associated pays for the free charging to users). In examples provided by UDIA members, if these structures are located within the Neighbourhood-Type Suite of Zones public notification is triggered due to the advertising component. Conversely if EV charging infrastructure in other zones is not expressly excluded by Table 5 and therefore the infrastructure itself triggers public notice.

   The UDIA encourages the reduction in red tape including streamlined assessment process for this essential infrastructure. We would strongly support the introduction of Code policy to provide incentives and reductions in car parking where charging stations are provided as part of a development.

   The Government may also need to consider the long-term planning for increased demand for electricity infrastructure to support his shift.

2. If EV charging stations became a form a development, there are currently no dedicated policies within the Code that seek to guide the design of residential or commercial car parking arrangements in relation to EV charging infrastructure. Should dedicated policies be developed to guide the design of EV charging infrastructure?

There are a range of policies within the Code that exist and could be applied to this land use, including access and parking, interface between land use, design and appearance etc.

If EV charging stations became a form a development, there are currently no dedicated policies with the Code that seek to guide the design of residential or commercial car parking arrangements in relation to EV charging infrastructure. Should dedicated policies be developed to guide the design of EV charging infrastructure?

Car Parking Off-Set Schemes

1. What are the implications of car parking fund being used for projects other than centrally located car parking in Activity Centres (such as a retail precinct)?
2. What types of projects and/or initiatives would you support the car parking funds being used for, if not only for the establishment of centrally located car parking?

The UDIA supports the establishment of car parking funds where it offers an appropriate alternative to the provision of on-site parking. However, we do note that several councils, namely the City of Salisbury, City of Port Adelaide Enfield and City of Norwood, Payneham and St Peters set up car parking funds and then dissolved them.

Car parking off-set schemes should:

- Involve industry participation in their development
- Have fair and reasonable fees that do not erode the confidence of industry to invest in areas
- Ensure the funding to be captured is sufficient to deliver on the ground outcomes or will be 'topped up' by the local council or other body (i.e. the scale needs to be right).
- Be designed to minimise administrative overheads
- Provide certainty, accountability and transparency.

As with any off-set scheme or payments from the development industry it is crucial that the intended purpose is clear, the cost is a reasonable impost on development, there is a suitable number of developments that ensure the funding provided is sufficient to deliver an outcome and there is a clear connection to the Code.

The UDIA does not consider that car parking off-set schemes should be applied to master planned developments or strategic infill sites.

The main application of car parking funds has been for activity centre precincts and mainstreets where development is being undertaken within constrained sites, where on-site car parking numbers are difficult to achieve. As set out above, these schemes can be effective but require careful management to ensure they deliver car parking on the ground.

Commission Prepared Design Standards

1. Do you think there would be benefit from the Commission preparing local road Design Standards?

There is significant frustration within the industry around the lack of clear standards for local roads, which typically vary from Council to Council. There would be significant time and cost savings for the development sector if a standard set of design requirements could be achieved. However, Councils

must accept Design Standards that are adopted by the Commission. The UDIA would welcome the opportunity to liaise and consult with the Commission, LGA and Council's to inform the development of suitable Design Standards.

The introduction of a broadly accepted standard will need to provide scope flexibility to ensure innovation is not stifled.

Native Vegetation

1. What are the issues being experienced in the interface between the removal of regulated trees and native vegetation?
2. Are there any other issues connecting native vegetation and planning policy?

The introduction of the Native Vegetation Overlay and the State Significant Native Vegetation Overlay have strengthened the nexus between the planning assessment process and Native Vegetation Act. However, there is still a separate assessment and approvals process under the Native Vegetation Act. An amendment to the Native Vegetation Regulations could exempt the need for approval under the NV Act where an application was referred to the Native Vegetation Council under the PDI Act. This is similar to the EPA licensing process.

There is often significant confusion in areas where both regulated tree and native vegetation controls apply.

For enhanced clarity, the system could also be designed to state that one scheme takes precedence over the other so that approval processes are not unnecessarily complicated and duplicated.

Tree Canopy

3. What are the implications of master planned/greenfield development areas also being required to ensure at least one (1) tree is planted per new dwelling, in addition to the existing provision of public reserves/parks?
4. If this policy was introduced, what are your thoughts relating to the potential requirement to plant a tree to the rear of a dwelling site as an option?

The UDIA understands the importance of urban tree canopy to our long-term sustainability and climate change resilience. We understand that the Urban Tree Canopy Overlay was introduced to address tree loss through urban infill. The policy was specifically designed for infill development where more granular policies are needed to address tree loss, provide for soft landscaping, and address the impact of additional hard surfaces on stormwater systems and urban heat load.

Master planned communities aim to not only have the same level of sustainability and tree canopy levels as Adelaide's more established suburbs but aspire to meet and exceed them. However, there are many ways this can be achieved.

Sustainability can be achieved through the integrated design of the public and private realm, with coordinated tree planting and integrated stormwater solutions based on Water Sensitive Urban Design Principles. These issues are largely addressed at the master plan/ land division level rather than at the individual dwelling application level.

The UDIA would support flexibility about the location of trees on infill development sites.

Tree Protections

The current legislative framework achieves a reasonable and appropriate balance between protection of large established trees and achievement of urban infill and development across Greater Adelaide. Any change to the current legislative and policy framework to remove or alter current exemptions (ie tree circumference of distance to a dwelling or swimming pool) should include robust assessment and analysis of the implications of change with respect to reduced dwelling yields, achievement of infill targets as well as impact on housing affordability.

5. What are the implications of reducing the minimum circumference for regulated and significant tree protections?

   A jurisdictional comparison of tree protection measures should include a comprehensive review of greening strategies adopted by each Australian state.

   The tightening of existing tree protection controls will have significant impacts on property values, further constraining development potential of land as well as impacting on landowner rights to remove trees on private land, including circumstances where there are genuine safety concerns.

6. What are the implications of introducing a height protection threshold, to assist in meeting canopy targets?

   The current tree circumference test is appropriate on the basis that:

   - it is simple to understand
   - does not require technical expertise
   - is cost effective and accurate, minimising legal disputes.

7. What are the implications of introducing a crown spread protection, to assist in meeting canopy targets?

8. What are the implications of introducing species- based tree protections?

   The UDIA supports the intention to protect Significant and Regulated Trees in Adelaide. We also support the current simple framework to identify Significant and Regulated Trees, and the inclusion of exemptions that protect significant buildings from tree affects.

   The UDIA does not support changes to Significant and Regulated Tree policy which will increase the complexity of the assessment process, have the potential to put buildings and assets at risk, or significantly impact on the development potential of land.

Distance from Development

9. Currently you can remove a protected tree (excluding *Agonis flexuosa* (Willow Myrtle) or Eucalyptus (any tree of the genus) if it is within ten (10) metres of a dwelling or swimming pool. What are the implications of reducing this distance?

10. What are the implications of revising the circumstances when it would be permissible to permit a protected tree to be removed (i.e. not only when it is within the proximity of a major structure, and/or poses a threat to safety and/or infrastructure)?

    The removal or alteration of exemptions for the removal of trees in proximity to dwellings and pools have been introduced to manage the risk of damage to people's homes and assets. Before varying

these provisions, a clear rationale would need to be provided and a risk assessment undertaken to understand the impact of reduced exemptions, (ie materials, damage to property, insurance etc).

Urban Tree Canopy Off Set Scheme

11. What are the implications of increasing the fee for payment into the Off-set scheme?
12. If the fee was increased, what are your thoughts about aligning the fee with the actual cost to a council of delivering (and maintaining) a tree, noting that this would result in differing costs in different locations?

Despite fears that all developers would elect to pay into the Tree Canopy Off-set Scheme in lieu of planting trees, the UDIA notes the Expert Panel has identified that there have only been 10 applications requiring payment into the Scheme. This equates to 5% of all eligible applications.

There will always be examples where trees cannot be provided on-site, and an alternative solution needs to be available (particularly for constrained sites).

A standardised fee for the off-set is supported, however raising these fees must be balanced against housing affordability and the range of charges that add up for a development (e.g., open space contribution). Charging what it costs for councils to maintain a tree is not a fair or reasonable way to calculate the off-set and is likely to raise it significantly.

Greater transparency in the use of the off-set funds is important.

Setting a fee at the level to be maintained by Council's sets a high bar that will ultimately drive up development costs and therefore increase the cost of housing.

13. What are the implications of increasing the off-set fees for the removal or regulated or significant trees?

There are occasions when it is not possible or inappropriate to replace Regulated and Significant Trees on a site in urban areas. The off-set scheme is therefore an appropriate mechanism to off-set tree loss. Increasing the cost of tree removal for infill and master planned developments would however add a significant cost burden to development and should not be applied in cases where the trees can be replaced. Many developers regard trees as an asset and therefore only remove them when there is a negative impact on the urban outcome.

Public Realm Tree Planting

14. Should the criteria within the Planning and Development Fund application assessment process give greater weighting to the provision of increased tree canopy?

South Australia has the highest open space provision requirement in the country at 12.5 per cent of the area of a land division whereas other states range from 6 per cent to 10 per cent. Some inner-middle suburban councils have suggested a provision of 20–25 per cent open space in medium density developments, an amount which is clearly unsustainable from a land economics and a maintenance perspective.

In contrast, some fringe metropolitan councils actively encourage a lower requirement for open space, typically around 8 per cent, and collect a financial contribution to make up the outstanding balance.

The Planning and Development Fund should be reviewed as follows:

- Facilitate better urban amenity and accessibility by committing to reviewing and reforming the open space contributions to create a fairer and more flexible approach.
- Through amendment to the Regulations, or Act, incorporate all open space uses into the 12.5 per cent contribution and not seek additional land for other open space purposes (eg stormwater which is also adding to open space amenity).
- Restrict the ability to impose an unreasonable minimum open space size for parks and reserves by recognising within the Code that there are multiple uses and sizes of reserves which serve a variety of purposes.

In terms of the use of the fund for tree canopy, we recognise that planting trees in public spaces provides significant benefit to local communities and can contribute to public amenity, place making and remove urban heat load impacts in urban areas design.

The P&D Fund criteria needs to ensure public benefit is achieved and balances the role of this fund with the Tree Off-set Scheme funds.

Character and Heritage Policy

1. In relation to prong two (2) pertaining to character area statements, in the current system, what is and is not working, and are there gaps and/or deficiencies?
2. Noting the Panel's recommendations to the Minister on prongs one (1) and two (2) of the Commission's proposal, are there additional approaches available for enhancing character areas?

The Historic Areas Overlay and Character Areas Overlay have fundamentally different purposes:

- Historic Areas - planning provisions promote the retention of buildings that contribute to the heritage values of an area. Planning provisions ensure new development is complementary to established heritage values.
- Character Areas - the focus of planning provisions is not on restricting demolition, rather on the form and character of replacement/new development that is complementary to clearly established character objectives.

Historic (Conservation) Zones within Development Plans were largely transitioned into Historic Areas under the Code. However, many of these would not meet any heritage test if it was to be applied today.

A large portion of Greater Adelaide's Inner Metropolitan Area is within a Historic Area, placing substantial constraints on growth within inner metro suburbs (within 10km of the CBD).

Demolition controls are generally stronger for Historic Areas than Historic (Conservation) Zones under Development Plans (with a few outlier exceptions).

The elevation of Character Areas to Historic Areas will expand the application of demolition controls to new areas. This should only be on the basis that it is to protect 'heritage'. The impact of this change would be to reduce the capacity of new housing forms to be developed in key inner areas of Adelaide. This is now the case, where most of the City of Unley, along with suburbs of Medindie, Gilberton, St Peters, Rose Park and Toorak Gardens are within a Historic Area Overlay.

While there has been criticism from Councils about Historic Statements and Character Statements, they should be limited to identifying the most important and consistent elements of heritage or character value in the surrounding area. They are an expression of what exists.

When Statements are read with the relevant provision of the Overlays, they are effective in providing guidance for development assessment purposes. Statements should not be updated to include policy content, which should remain in the Overlay. The Statements should clearly identify the elements /characteristics of value.

There is room for ongoing improvements to these Statements, however it is important that the intent does not lead to lengthy commentary that undermines the streamlining of policy achieved through the reform program.

3. What are your views on introducing a development assessment pathway to only allow for demolition of a building in a Character Area (and Historic Area) once a replacement building has been approved?

4. What difficulties do you think this assessment pathway may pose? How could those difficulties be overcome?

This proposal aims to introduce a new development assessment pathway that only allows for the demolition of buildings within a Character Area or Historic Area Overlay once a replacement building has been approved.

The Code appropriately removed the replacement building test from the planning rules.

The assessment for demolition should be on the basis that the building is of heritage value. A Local Heritage Place Overlay or State Heritage Place Overlay already exist for those properties identified as having characteristics of value, which have generally been informed by in depth heritage surveys. The Local Heritage Place Overlay and State Heritage Place Overlays already have suitable 'demolition' tests associated with them. The UDIA agree with this approach that Demolition policies should support the protection of places that display historical attributes worthy of preservation. Those dwelling that are not considered to be of value should not be unduly restricted from being demolished until a replacement dwelling has been approved.

Further, the design of a replacement building should be unrelated to the heritage value of an existing building and assessed against the design requirements within the relevant overlay.

This doesn't mean that the design of new buildings is not important. Any application for new development must satisfy several clear tests in the Code. These tests include:

- consistency/compatibility with nearby heritage buildings in terms of streetscapes
- front /side boundary setbacks, and
- architectural detailing (wall height, roof pitch/form, window and door openings, chimneys, verandas and materials).

The role of the Character Area Overlay is to ensure development complements the established character of the locality, rather than to control the removal of buildings that do not have heritage value.

Local Heritage in the PDI Act

1. What would be the implications of having the heritage process managed by heritage experts through the Heritage Places Act (rather than planners under the PDI Act)?

   The UDIA supports heritage expertise underpinning heritage decision-making. However, heritage must still be balanced with the overall development potential of areas.

   Control at the State Government level achieves consistency in the approach to heritage listing processes and we support Government maintaining an oversight role.

2. What would be the implications of sections 67(4) and 67(5) of the PDI Act being commenced?

   In relation to the introduction of section 67(4) and 67(5) of the PDI Act. This provision essentially puts the definition of character areas in the Code to a community vote. While the sentiment and intention are positive, this is a poor precedence for other policy decisions, and overall is not considered to be good practice.

3. Planning System Delivery and Operation

Website Re-Design

1. Is the PlanSA website easy to use?

   The UDIA SA support the refresh of the PlanSA website to enable the easy accessibility of information to all South Australians. Whilst the current website provides a wealth of information, it is not considered to be simple to use or intrinsic to navigate to find information you are seeking (even for the seasoned professional!).

   UDIA support the Panel's recommendation to enable a 'subscription service' to enable the community to subscribe and receive notification to certain types of development and changes to the status of applications. This will improve system usability for all South Australians without the need to continually monitor the website.

   UDIA also support the Panel's recommendation of providing an interactive development application tracking map that would like back to the public register and notification page. This will assist in making data easily accessible to all South Australians and be able to clearly see the location of applications which may affect them.

2. What improvements to the PlanSA design would you make to enhance its usability?

Mobile Application for Submission of Building Notifications and Inspections

1. Would submitting building notifications and inspections via a mobile device make these processes more efficient?

   The UDIA support the previous Expert Panel on Planning Reform's December 2014 recommendations outlined in 'The Planning System We Want' that sought to "*capitalize on emerging technologies should improve access and reduce delays and duplication*." The suggestion to submit building notifications and inspections via a mobile device/app to improve system accessibility and reduce delays is supported.

2. Where relevant, would you use a mobile submission function or are you more likely to continue to use a desktop?

Online Submission Forms

UDIA supports the Panel's recommendation to create a centralized database of Builder's information that is integrated into the e-Planning portal removing the requirement to manually enter Builder's data for each individual application. We also strongly support the modification of the online application form to save and reuse common contacts to auto populate pre-saved contact details. This will assist in streamlining the system and reduce the time taken to lodge an application.

Whilst we support the Panel's recommendation to enable the relevant authority to generate a checklist with each application which identifies the relevant assessment criteria, especially in relation to Deemed to Satisfy applications, it is recommended that such a checklist be made available to the general public to reduce time wading through the pages of policy generated by the current pdf versions. This could be akin to the old 'Residential Code' checklist under the rescinded *Development Act 1993*.

1. Is there benefit to simplifying the submission process so that a PlanSA login is not required?

   The UDIA strongly support the Panel's suggestion of simplifying the submission process of development application's on the DAP system. Currently all applicants are required to have a PlanSA login system that must be generated by PlanSA staff, which can take a number of days. By removing the need to have a PlanSA login created, all South Australians will have access to the system without unnecessary delay.

2. Does requiring the creation of a PlanSA login negatively impact user experience?

3. What challenges, if any, may result from an applicant not having a logon with PlanSA?

Increase Relevant Authority Data Management

1. What would be the advantages of increasing relevant authorities' data management capabilities?

   The UDIA supports any improvements to the e-Planning system that ensure the timely assessment of applications and the reduction in 'double handling' between the relevant authority and departmental staff.

   In addition to providing increased data management capabilities to relevant authorities, it is also recommended that the e-Planning system be altered to enable applicants to upload additional documents between submission and 'verification' of the application. Under the current system once an application has been 'submitted' there is no functionality to enable other documents to be uploaded (even if a document has been accidently forgotten during the lodgment uploading process) until the application has either been 'verified' by the relevant authority or the relevant authority has requested additional documentation be provided on the portal.

2. What concerns, if any, do you have about enabling relevant authorities to 'self-service' changes to development applications in the DAP?

   Any changes to the portal that increase the ability for relevant authorities to manage data should ensure that this improves/expediates assessment timeframes and provides for a more robust and transparent system. The UDIA would welcome the opportunity to workshop possible options for improvement further in this regard.

Inspection Clocks

3. What are the advantages of introducing inspection clock functionality?

   The UDIA supports the suggestion of implementing inspection clocks to ensure the relevant authority undertakes timely inspection after the given of notification. This would also provide greater transparency within the system.

4. What concerns, if any, would you have about clock functionality linked to inspections?
5. What, if any, impact would enabling clock functionality on inspections be likely to have on relevant authorities and builders?

Collection of lodgment fee at submission

6. Would you be supportive of the lodgment fee being paid on application, with planning consent fees to follow verification?

   The UDIA strongly supports the Expert Panel's suggestion of 'locking in' the relevant version of the Code at time of submission of an application by way of payment of the lodgment fee. This will ensure that any Code Amendments that become operational between submission, verification and ultimate payment of fees and official 'lodgment' will not alter the assessment once submitted. This will provide certainty to the development industry and avoid any doubt on which version of the Code should be applied to an application.
   Members have also raised concerns that the Portal currently only allows planning applications to be paid by credit card online. This is difficult when there are multiple applications submitted (ie. 60+ individual built form applications for a master planned project). Members have outlined that it can be a challenge to have a credit card limit able to accommodate this. Most business preference is to pay via EFT however no bank details are provided for PlanSA. Having this updated in the Portal would be a great help for more efficient business practices.

   Further, members have advised that submitting applications on parent titles can be a challenge when new titles are issued. Essentially the whole planning process needs to be done again on the individual title. This is a double up of work and fees, etc. Ideally it would be good if the Portal allowed submissions on the parent title and then when new titles are issued, it could associate the existing approval with a new title reference. This would streamline the process.

7. What challenges, if any, would arise as a consequence of 'locking in' the Code provisions at lodgment? How could those challenges be overcome?

   The only challenge for payment of a lodgment fee upon submission of the application would be for planning practitioners who submit applications on behalf of their clients then being required to pay the lodgment fee. One recommendation could be that once 'submitted' an option would be for a link to be sent to those listed as responsible for 'invoicing' on the DAP system.

Combined Verification and Assessment Processes

8. What are the current system obstacles that prevent relevant authorities from making decisions on DTS and Performance Assessed applications quickly?
9. What would be the advantages of implementing a streamlined assessment process of this nature?

   The UDIA strongly support the suggestion of a combined Verification and Assessment process. Where applications satisfy the DTS pathway or satisfy relevant performance outcome of the Code applications should be approved quickly, reducing frustration, uncertainty and unnecessary expense.

10. What, if any, impact would a streamlined assessment process have for non-council relevant authorities?

Automatic Issue of Decision Notification Form

11. What are the advantages of the e-Planning system being able to automatically issue a Decision Notification Form?

    The UDIA supports the automatic issue of a Decision Notification Form for Deemed to Satisfy forms of developments. This will enable quicker processing times and reduce administrative delays currently experienced in the system.

12. What do you consider would be the key challenges of implementing an automatic system of this nature?

    For Performance Assessed forms of development, especially where public notice is required, the automatic Decision Notification function may be more challenging to implement.

13. If this was to be implemented, should there be any limitations attached to the functionality (i.e., a timeframe for payment of fees or the determination will lapse)?

Building Notification through PlanSA

14. Would you be supportive of mandating building notifications be submitted through PlanSA?

    Whilst the UDIA generally supports the intent of ensuring a streamlined system and reducing 'double handling', concern is raised regarding mandating that building notifications be submitted directly through the PlanSA portal without first ensuring that appropriate technology is in place (i.e. phone or tablet based app) to enable the notification to be made whilst on the job site rather than a desktop pc.

15. What challenges, if any, would arise as a consequence of removing the ability for building notifications to be received by telephone or in writing to a relevant council? How could those challenges be overcome?

16. Would this amendment provide efficiencies to relevant authorities?

Remove Building Consent Verification

17. Would you be supportive of removing the requirement to verify an application for building consent?

    The UDIA strongly support the Expert Panel's suggestion of removing the requirement to verify an application for building consent. This suggestion would further streamline the process and reduce delays in the system. A relevant authority would still retain the ability to request further information pursuant to clause 119(3) of the PDI Act.

18. What challenges, if any, would arise as a consequence of removing building consent verification? How could those challenges be overcome?

Concurrent Planning and Building Assessment

26. What would be the implications of enabling multiple consents to be assessed at the same time

    UDIA Strongly supports the proposal to enable concurrent Planning and Building Assessment. This would reduce the overall timeframe for the assessment process and streamline the approval system. Currently UDIA members experience time delays between obtaining Planning Consent, the relevant authority issuing the DNF and stamped plans onto the PlanSA Portal then not being able to upload their Building Rules Consent until the previous steps have been completed. The proposal to enable multiple consents to be assessed at the same time was a clear intent of the original planning reforms and its implementation should be a priority.

Extract for the Grow Reform Build UDIA document:

> ***Invest in the development of a new real time electronic urban development monitoring tool in partnership with the UDIA, to improve state-wide planning for growth, liveability and affordability, and encourage increased private sector investment.***

Innovation – Automatic assessments check for DTS Applications

The UDIA support the investment in new technologies to enhance and fast track the processing of development applications, such as the suggested automated assessment checks of DTS applications. This could be a useful tool for one-time users of the planning system. A statewide implementation of such a tool in the planning system may alleviate the workload pressures on relevant authorities and improve timeframes particularly within the 'verification' period.

Innovation – 3D Modelling for Development Application Tracker and Public Notification

Whilst it is acknowledged 3D modelling can assist in the ability to interpret plans and understand a development's 'look and feel', the production costs of 3D renders are far greater than 2D plans and take greater time to produce. The requirement to provide 3D renders with applications should be limited to certain classification or zones for example, development of greater than 4 storeys where located within the 'Design Overlay.' This should not be mandated for all development classifications, and ideally should only apply for more significant development proposals.

Innovation – Augmented Reality Mobile Application

Augmented Reality tools provide a useful tool to interpret the 'look and feel' of a development proposal and the ability to 'see it' especially for those not able to interpret 2D plans. Augmented Reality tools would be particularly useful for those larger scale applications that require public notice, however the cost to produce augmented reality 'plans' is far greater than standard 2D or 3D renders. Consequently, the use of such technology should be carefully considered and limited to certain classifications of development or zones, for example development of greater than 4 storeys where located within the 'Design Overlay' or within the 'Urban Corridor' suite of Zones.

Innovation – Accessibility through Mobile Applications

The UDIA support the investment in new technologies to enhance the usability of the PlanSA website and DAP system particularly to cater for mobile devices.

4. Appendix

1. UDIA Submission on Developer Deed Review and Infrastructure Schemes
2. UDIA Submission to the State Planning Commission on Miscellaneous Technical Enhancement Code Amendment (MTECA)
3. UDIA Submission on Land Supply Reports and State Planning Commission EFPA review
4. UDIA Grow Reform Build 2022

The above reports have been supplied as attachments to DTI.PlanningReview@sa.gov.au on Friday, 16th December 2022.

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Level 1, 26 Flinders Street
Adelaide SA 5000

6th August 2021

Ms Helen Dyer
Chair
State Planning Commission
Level 5, 50 Flinders Street,
Adelaide SA 5000

Dear Ms Dyer

RE: Environment and Food Protection Areas (EFPA) Review 2021 Statement of Position released by the South Australian State Planning Commission (SPC)

Please find attached the Urban Development Institute of Australia (UDIA) submission in relation to the recently released Environment and Food Protection Areas (EFPA) Review 2021 Statement of Position released by the South Australian State Planning Commission (SPC).

In terms of the legislated requirements for review, it is of concern to the UDIA that the SPC has wrongly narrowed the scope of the EFPA review under section 7(10) of the Act and is undertaking the review too far in advance of the legislated review date (at some time after 1 April 2022). The attached legal advice from Botten Levinson Lawyers details the problems with the review as it is presently framed.

Notwithstanding the SPC is able to conduct a review from time to time under section 7(8) of the Act, the UDIA believes the SPC should undertake the five yearly review in accordance with the requirements of the Act and not foreclose any consideration of the relevant issues. We maintain that this will require the review to be undertaken in 2022 having regards to all of the matters relevant to section 7(3)(a) of the Act. This will require proper consultation on the land supply matters (at or close to April 2022) that the present review wrongly states are not open for discussion.

In addition to the above, we are concerned about the use of the associated Land Supply Reports. Rather than shaping Adelaide in the most appropriate way to take account of new trends in living patterns or addressing affordability to maintain Adelaide's liveability, it appears they will be utilised as references to either approve (or not) future developments based on the historical patterns of development that have been extrapolated into future forecasts.

We are also concerned about the assumptions underpinning the reports (see attachment). It is the incorrect assertions about excess land supply that have too often been used as a reason for restricting development because of the government's reluctance to invest in infrastructure, which unfortunately is at the expense of the primary driver in maintaining housing affordability, namely competitive market tension.

Despite our repeated offers, the release of such important supporting documents with no formal consultation is disappointing. Without addressing these concerns, we fear for the State's overall liveability and affordability and the significant and unnecessary risk to the State's economy.

The UDIA will continue to offer its support to work with the Department to take advantage of important industry insights, and we look forward to discussing this submission with you in more detail.

Regards

Pat Gerace
CHIEF EXECUTIVE

Attachment 1: Environment and Food Production Areas Review 2021 Submission (UDIA)
Attachment 2: Legal Advice - Botten Levinson

CC- Deputy Premier, Attorney-General, Hon Vickie Chapman MP

This submission contains commentary on:

1. EFPA review process to date and associated legislation
2. Status and use of Land Supply Reports as planning policy
3. Land Supply and EFPA Report – Assumptions and Scenario Analysis
4. Land Supply Report for Greater Adelaide – Greenfield
5. Land Supply Report for Greater Adelaide – Urban Infill
6. Land Supply Report for Greater Adelaide – Employment
7. Environment and Food Production Areas Review 2021 – Statement of Position
8. Recommendations

EFPA review process and associated legislation

While the review of the EFPA did not ask for commentary on the Planning Development and Infrastructure Act (PDI), unfortunately the consequences of the Bill passed are now evident.

The UDIA was very clear at the time of the implementation and during the debate of the PDI Bill that it did not support the inclusion of the Environment and Food Protection Areas within the legislation as drafted for several reasons.

We said at the time the framework was flawed and designed so that there would never be any changes. We are now faced with a situation where the supply of land and affordability of housing in certain areas is at a very significant risk as a result.

At the time the UDIA stated:

> *By requiring Parliament to legislate to amend the boundary presents a great risk for South Australia in its capacity to quickly respond to future challenges and is likely to lead to it only reacting in a time of crisis. Through the current policy and zoning regimes an effective boundary is already in place. A legislated urban growth boundary may only cause future speculation and adversely impact home affordability and choice.*

The UDIA believes the objective evidence and existing policy landscape was more than sufficient to ensure that Adelaide's growth could continue to occur in an orderly and sustainable way.

The implementation of the boundary as part of the Act included no meaningful consultation on the location of the boundaries and was only provided days before being laid on the table in Parliament.

The Government at the time provided no modelling or objective analysis about the conclusions that it had come to with respect to these boundaries and was an example of bad public policy which ultimately succumbed to parliamentary fatigue.

Despite our warnings, included in the Bill was the requirement that future reviews of the boundary on a five yearly basis would be required by the SPC, but parliamentary scrutiny and oversight would be required for that to take effect. The UDIA stated at the time that things can change rapidly and the need for addressing the location of the boundaries must be more flexible. The significant hurdles, namely parliamentary approval was flawed from the outset because it would be next to impossible to amend despite the touted objectivity. We believe that this level of detailed planning policy should not be subject to the full parliamentary process.

Policy decisions around the definition of available supply within the Act also fail to recognise the many nuances of planning for Greater Adelaide. This composition of dwelling types, requisite infrastructure, supply in various submarkets, the difference in prices and product types all factor into the liveability of Adelaide.

Following the passing of the Bill on the 12th of April 2016 the UDIA wrote to the then Minister and expressed our concern at the very broad criteria specified in the Act that the Commission has to consider. We said at the time:

> *The criteria refers to fifteen years supply and we urge you to ensure that this applies in all identifiable locations. For example this should apply to townships surrounded by the Environment and Food Production Areas as well as each council area (particularly metro). Any measure of supply should not be satisfied by pointing to one or two growth areas only.*

and

> *Finally, underpinning all the above is housing affordability. This needs to be a key criteria to ensure that house and land prices per square metre are significantly lower than all other mainland capitals.*

Following raising these matters, the UDIA has consistently requested information from the Government about what it called its Metropolitan Growth Management Plan, and what we understood to be the basis for how the Department would inform the SPC as part of its statutory obligations under the Act.

We expressed concern about the Department's pilot project in the City of Onkaparinga, met with the former chair of the Planning Commission about this, and also expressed on numerous occasions to the former Minister the need for work to commence with meaningful consultation to inform any conclusions. Unfortunately, with the release of the Statement of Position and recent Land Supply Reports the UDIA concerns have now been realised.

We are seeing for only the first time the type of analysis that the Department has been doing to conclude that the legislative thresholds for boundary adjustments are met or not. It also appears the Department has still not defined exactly how it would be applying the legislative test that relates to "*the principle of urban renewal and consolidation of existing urban areas"* and "*adequate provision cannot be made within Greater Adelaide outside environment and food production areas to accommodate housing and employment growth over the longer term"*.

As mentioned in our cover letter, in addition the UDIA has sought legal advice which also disputes the interpretation in the SPC's Statement of Position that these questions are not required to be addressed (attached).

<u>Status and use of Land Supply Reports</u>

Included in the *Land Supply Report for Greater Adelaide Background and Context* paper in section *1.4 How it will be used?* it states:

> *"This information will be used as an evidence base to determine the capacity of the land use planning system to provide an adequate supply of appropriate land to meet this demand"*

and

> *"In particular, the report will provide base line data to help inform deliberations on the rezoning of land for residential and employment activities."*

In addition to the previous comments raised above together with the detailed commentary on the reports further on, the UDIA is concerned that instead of these land supply reports being used to inform future policy frameworks, they are being used instead as assessment tools.

We believe that development approvals based primarily on supply alone ignore the nuances of differing products and the role of private sector competition. We are concerned future code amendments and development will be at risk because assessment will be framed in the context of the inaccurate available supply that these reports conclude.

One of the other concerns is the conclusion related to general infill. The UDIA strongly supports strategic infill within metropolitan Adelaide, and we commend the Department for the first time categorising the types of infill, we are however concerned about the level of supply predicted from general infill.

It is general infill that has caused considerable community angst and the SPC itself spent considerable time working on developing infill guidelines because of the backlash around the impacts of this unplanned development.

General infill development does not make a contribution to the enhancement or upgrading of existing infrastructure networks and it is particularly concerning the reliance on this as a key part of supply considering the Department's own *Background and Context* reports itself contains submissions by utilities who explicitly state that "t*runk infrastructure in more established urban areas is aged and was not designed to accommodate the increased demands currently being generated by urban infill*".

The UDIA has long been aware of these issues, and in fact it was the UDIA who convened a roundtable with Minister Knoll, the SPC and major utilities in March 2019 to raise these very issues.

In contrast, greenfield development and strategic infill are required to make sure much of the infrastructure is properly planned and provisioned for with contributions made by developers. General infill only contributes to the Planning and Development Fund upon the creation of allotments with none of those proceeds addressing any of the local issues created.

Land Supply and EFPA Report – General Commentary

The Land Supply reports will be used as an input to the upcoming review of the 30 Year Plan. As such getting the data and analysis correct is of considerable significance. Whilst the reports have considered medium and high growth scenarios the report has not undertaken appropriate scenario analyses. These reports should be seen as a resource for other work not as an outcome in themselves. The process these reports are involved in should be about seeking growth opportunities in infill and greenfield locations. Maintaining or enhancing housing affordability is considered to be a key principle in the analysis of data and scenarios as well as the determination of policy responses.

The Land Supply reports are largely based upon June 2020 data. Since that time COVID19 and the Federal and State Government's responses have led to typical urban development patterns being changed somewhat. Whether these changes are short term or longer term in nature are unknown at this stage. As a result, the range of potential forecasts that need to be considered are wider than is typically the case.

The demand for the future creation of allotments and dwellings has relied upon the Centre for Population forecasts. Their Population Statement was issued in December 2020 which means much of the work would have been undertaken in the preceding months relying upon data that is probably close to 12 months old and not being aware of how the Federal and State Governments have subsequently dealt with COVID19 and in particular actual Net Overseas Migration (NOM) and Net Interstate Migration (NIM) in the past year. The assumed rapid rebound to having NOM being at around 100,000 pa in 2023 and 200,000 pa in 2024 might be somewhat ambitious given the recent four step plan announced by the Federal Government. If a delay in achieving those NOM numbers occurs then it is likely that there will be a reduction in demand in the mid 2020s from what has been stated.

We are also concerned about the reliance on dwelling commencements and completions as a measure of supply. The implications of this are that accurate data can be eighteen months to two years behind what the true supply levels are due to the time from signing a contract to building time due to civil construction etc.

Australia's response to COVID19 could well mean a greater demand from other countries' peoples seeking to immigrate to our country. As such depending on Federal Government policy with regard to allowing more migrants into Australia in a few years' time the NOM could easily be higher than stated.

The Population Statement has the NIM being negative for SA from 2022 onwards. The SA NIM had been slowly heading towards a 0 figure prior to COVID19 and has been a small positive number (98[1]) in the last 12 months. "The State Government is attempting to attract more interstate migrants and bring ex-South Australians home by selling the lifestyle benefits, lower house prices and availability of high-tech jobs in the space, defence and hydrogen industries. It is using a rebadged $200-million Jobs and Economic Growth Fund to target industries such as space, hydrogen, plant-based foods and defence with business development funding."[2] To assume the SA NIM will head back to around -3000 pa means the Growth State[3] strategies the State Government has been putting in place to reverse that loss won't work.

With Adelaide being ranked the 3rd most liveable city[4] in the world and the 3rd most honest city[5] out of 75 world cities, the attractiveness of Adelaide has the potential to increase the demand from local and overseas sources beyond what has been considered in the reports. Housing affordability relative to other capital cities in Australia is a positive factor and is something that we can't afford to lose.

The High Growth scenario in Table 2 for 2020 – 2030 has a lesser growth than the previous decade. The UDIA is concerned that the High Growth Scenario is not as high as it plausibly could be. If demand is higher than forecasted then affordability issues will arise, and quickly. Enabling more land to be developed, whether that be for greenfield or infill, is a lengthy process. On average the time it takes for a greenfield development to go from a piece of rural land through the strategic planning process, then rezoning, then gaining development approvals to building the first dwelling is 13 years. This is largely due to the infrequent nature of strategic planning processes. If you get the strategic planning slightly wrong then adverse outcomes can easily arise.

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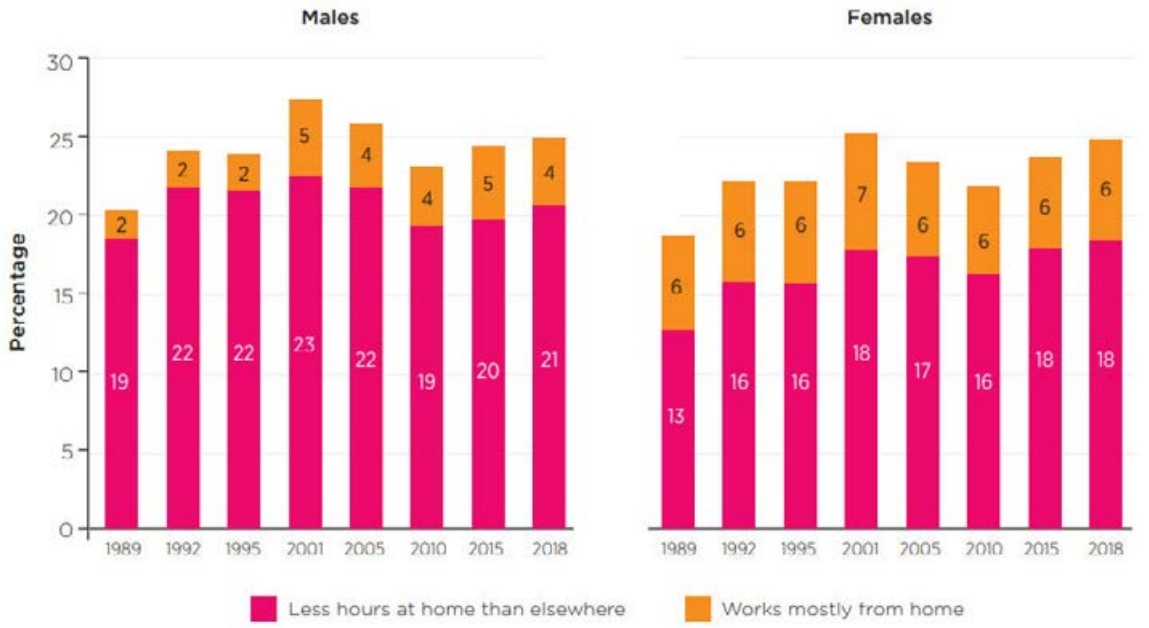
[1] ABS – media release 4 May 2021
[2] The Urban Developer – 15 July 2021
[3] www.growthstate.sa.gov.au
[4] Economic Intelligence Unit Global Liveability Index 2021
[5] TWINNER-20210304_Honest-Cities-Index_EN.pdf

Whilst the report has a section on trends that are likely to influence urban development and the growth in peri-urban and regional towns near Adelaide is mentioned there is no mention of the work from home shift in the past year. The historical longer term 'works mostly from home' percentage has been around 5% of employees, with it being lower for males and higher for females as seen in the table below[6].

Figure 10: Working from home, employed persons, 1989–2018



Note: Employed persons working at least 50% of their usual weekly work hours at home were classified as working mainly from home.
Source: ABS Working from home survey (1989, 1992 and 1995) and HILDA 2001 to 2018
Credit: Australian Institute of Family Studies 2020 (aifs.gov.au/copyright)

In February 2021 around 41%[7] of employed people in Australia worked from home at least one day a week which is considerably higher than the approximately 20% in 2018. Should a minor but sizeable chunk of the workforce either mostly work from home (say 10 – 15%) or at least a day or two per week (possibly another 15 - 20%) there are considerable impacts on urban development and management of our urban areas that will arise. The report has not considered such a scenario and its impacts on expected demand in the 10 areas.

The household ratios used in Table 3 (p.22) range between 2.08 in the Inner Metro area to 2.28 in the Outer South. These appear to be averages across the areas as opposed to what actually occurs in new development in those areas, whether that be greenfield or infill. It is common for greenfield estates to have household ratios of around 3.0. Even the strategic infill development of Lightsview, which is a medium density infill project, has a household ratio considerably higher than 2.08.

With the Homebuilder grant boosting dwelling approvals and commencements substantially in the last 9 months the report should discuss what the impact of this will be on demand in the remainder of the 2020 – 2030 period.

It appears that the forecast lot/dwelling numbers have not considered the Planning and Design Code policy that was introduced on 19 March 2021. This is discussed further in the Infill section below.

[6] Australian Families Then & Now: How we worked (aifs.gov.au)
[7] ABS – media release 17 March 2021

Section 3 – Infrastructure, is considered to be, at best, a cursory glance at the issues associated with infrastructure. There is no analysis of the few issues mentioned in terms of the potential impacts on achieving greenfield and infill estimates of new lots/dwellings in the 10 areas that make up Greater Adelaide. For example, in Section 3.3 (Water Network) the issue of understanding infill hotspots and the consequential impact on required upgrades is mentioned but there is no analysis of what this means either at a whole area basis or a local government area basis or a suburb or part of suburb basis.

In Section 3.5 Electricity Network it states SAPN has a $1.6B infrastructure cap until 2025. There is no information in the report about where that spend is to be located and what areas it might assist in improving the ability to deliver infill and/or greenfield development.

Section 3.6 Transport Network does not provide any useful information about what is to be provided where and whether that is going to assist with achieving estimated lot/dwelling numbers in the 10 areas.

The issue of funding models is complex. With the corporatisation and privatisation of infrastructure agencies in the past few decades the frameworks that SA Water and SAPN, in particular, have to operate within are subject to national rules as well as SA Acts which have other players, such as ESCOSA, involved. The individual frameworks are somewhat clunky when you try to bring together all the infrastructure providers to plan and deliver potential solutions.

It is considered critical to the making of policy and infrastructure investment decisions that capacity analysis at a small scale is essential in order to work out where the challenging areas are and what needs to be done to fix them. There is no point implementing planning policy changes that allows greater development potential (ie increased density) if the infrastructure can't cope.

Land Supply Report for Greater Adelaide – Greenfield

The categories in Table 1 are a good start however the Undeveloped Zoned category needs further refinement. Some land that is zoned is unable to be developed viably due to a lack of infrastructure capacity or the scope of the upgrade is so large it overwhelms the scale of the development making it not possible. Splitting it into two subcategories is worthy of consideration –

. Undeveloped Zoned – infrastructure available

. Undeveloped Zoned – Infrastructure unavailable/unviable

The vacant lots column in Table 2 is June 2020 data. Since that time virtually all vacant lots have been sold due to the Homebuilder grant, so more recent data is essential.

The High Growth Scenario dwelling demand on 38,300 lots to 2030 needs all the Development Ready and 25% of the Undeveloped Zone land to be developed. It is highly likely the demand won't be spatially distributed as per the supply in Figure 1. If anyone were asked in 2010 what the demand for lots would be in Mt Barker they might have said 100 lots pa. Over 600 lots pa are now being developed in Mt Barker in 2021. The market can change considerably over 10 years.

In the Outer North under the High Growth Scenario the report states there will be demand for 16,400 dwellings with 13,000 coming from greenfield estates. This leaves 3,400 to come

from other sources, presumably infill. If the infill numbers are not able to be achieved then more will come from greenfield sources. Notwithstanding the greenfield land available, some do face infrastructure issues.

Table 4 has substantial amounts of supply controlled by a limited number of estates which are expected to take beyond 2030 to be fully developed. The table gives the impression that all lots will be developed by 2030 in these estates.

We are unable to determine if the 43ha of land at Karbeethan was included in the land available for development as it is zoned Future Urban, however it has been allocated for district open space.

We are also unsure if the potential dwelling numbers in Virginia considered the impact of flood affected land.

The remaining approximately 290ha of land at Blakeview has been assumed to deliver 5655 dwellings at just under 20 dwellings per hectare in gross terms. This is considered to be a high estimate given the need for drainage networks, open space, a school and activity centres.

In the Outer South rezonings will need to occur as the High Growth Scenario demand is 4100 dwellings and supply is 4174 dwellings in the Development Ready and Undeveloped Zoned categories. At present supply beyond 2030 is dependent on development occurring at Aldinga, Hackham and Sellicks Beach. (Despite community groups trying to stop development at Sellicks Beach) Additional long term supply (eg: Bowering Hill) should be considered which will inevitably involve land in the McLaren Vale Character Preservation area.

In the Adelaide Hills area the demand between 2020 and 2030 is estimated at 300pa. Given Mt Barker is delivering 600 dwellings pa at present and there are other townships that are growing it is considered the demand levels are more likely to be in the order of 5 – 7000 in total. There is little land available in many of the townships at the northern end of the area (eg: Kersbrook, Gumeracha, Birdwood). No analysis of potential infill for any towns in the entire area has been undertaken. If the ongoing response to COVID19 is that peri urban areas are in greater demand then there will be a considerable supply problem in many towns.

There has been no analysis made as to the appropriateness of the Hills Face Zone boundary which traverses Outer North, Inner North, Inner Metro, Inner South, Outer South and Adelaide Hills areas.

The Fleurieu area is expected to run out of supply in some towns before 2030 without rezonings occurring as demand will not pan out as per supply availability.

In the Northern Plains and Barossa area the figures are incorrect for Freeling. A sizeable part of the town (not impacted by EFPA) is still zoned Rural yet is counted in as Undeveloped Zoned. This should be categorised as Future Urban Growth.

Land Supply Report for Greater Adelaide – Urban Infill

Having the split between strategic infill and general infill is a useful planning tool. The 2010 – 2020 decade provided 22,600 dwellings classified as strategic infill and general infill provided 49,600 dwellings.

It is the UDIA's position that the outcomes achieved through strategic infill sites is far superior to the vast majority of general infill sites. The concerns about infill development raised by the community[8] have largely come from general infill (one into two dwellings). As such, finding more strategic infill sites should be a priority so that well planned, well designed and carefully implemented redevelopment projects are delivered. These could take the form of areas under multiple ownership.

The Land Supply report is heavily reliant on one into two developments so the factors that impact the ability to deliver such development are crucial.

The calculation of General Infill land supply by PLUS is summarised on p21 of Part 2 – Urban Infill. This set of assumptions are considered to be reasonably robust, however there are some nuances that might have been applied in those calculations that are not obvious. For example, how have the relevant zones been applied to assess redevelopment yields? Much of the Inner Metro area is subject to the Established Neighbourhood Zone and Suburban Neighbourhood Zone. The ability to increase density in these zones is very limited. It does not appear an analysis of minimum lot sizes and frontages against the zone policies as well as taking into account heritage area overlays, regulated and significant trees, tree planting requirements, on street parking, etc, was undertaken to see whether redevelopment is realistic.

The recently implemented Planning and Design Code policy relating to infill development has limited development potential, with a series of Missing Middle development typologies not being allowed in the vast majority of infill areas.

Even with the Planning and Design Code's General Neighbourhood Zone which covers large areas between Regency Rd and Grand Junction Rd and then around through the western suburbs (Inner North and Adelaide West areas) the zoning policy typically only allows one into two developments due to existing allotment sizes.

The limited Planning and Design Code policy regarding infill development on consolidated sites is unlikely to achieve much due to the policy metrics.

Anecdotally our members are already experiencing Councils using Deemed To Satisfy policy as the minimum policy when assessing Performance Assessed proposals.

In assuming 40% of sites with a Capital Value / Site Value Ratio (CVSVR) of 1.3 or less will be developed in the next 10 years, has consideration been given to the impact of existing lot sizes (e.g. removing lots below a certain threshold from redevelopment), proximity to noxious or licenced premises (e.g. Incetec Pivot in the past in Port Adelaide, OI Glass in Kilkenny etc.) and the exclusion of all strata title and community title lots (which are almost impossible to amalgamate and redevelop)? The requirement for infrastructure upgrades to enable infill development to occur is not dealt with by using the CVSVR tool.

If suitable allowance has been made for these types of factors, then the issue comes down to whether a 40% redevelopment over a 10 year period across all geographic areas is realistic. Table 4, p13 suggests that the top general infill suburbs have typically operated well below this level in the past decade. It is considered that the 40% figure for CVSVR of 1.3 or less (and 20% for CVSVR of 1.3 - 1.8) is far too high.

[8] State Planning Commission – Raising the bar on Residential Infill in the Planning and Design Code September 2020

Furthermore, the calculation represents an average across all sites meeting the CVSVR threshold, regardless of geographic location. This means that the Inner North, in particular, needs to deliver a very large number of general infill dwellings (28,285 compared with 11,100 for Adelaide West). This region will rely upon extensive redevelopment in areas such as Ridgehaven, Redwood Park, Banksia Park, Surrey Downs and Fairview Park, 15 – 20km from the City. Much of these suburbs are on sloping ground which will make it more challenging to deliver infill housing.

The progressive development of preferred locations may impact upon the take up of remaining opportunities for infill. Adelaide West has been a focus of redevelopment, but will provide fewer opportunities in the future (as reflected in PLUS projections). Will developers and more importantly purchasers readily shift to less prime infill locations?

The report has no analysis of infill capacity in the Adelaide Hills, Northern Plains and Barossa, Fleurieu, and Murray Bridge areas. Many towns in these areas have dwellings that are 80 + years old and are likely to have a CVSVR of <1.3. This potential supply needs to be taken into account.

The above issues relating to infill development are considered to mean that achieving the targets for general infill development stated in the reports are highly ambitious.

The strategic infill supply as shown in Figure 21 is heavily reliant upon three elements – Cheetham, CBD and the Corridor Zones. It is considered to be highly unlikely that a single developer estate such as Cheetham will deliver more than 300 lots per annum once the project actually commences. If the site is rezoned in 2022 and civil construction works begin in 2023 the project might deliver 1800 lots over the decade. Will the Adelaide CBD deliver 10,000 additional dwellings when at least the first third of the 2021 - 2030 decade is going to have much lesser numbers of overseas students. There are very few apartment projects being proposed at present, and given they typically have a 3 year development period it is likely that only 2 – 3000 dwellings might get developed. Other than Churchill Rd the corridors have been delivering about one hundred dwellings per annum. There are many businesses and residents along the corridors that are not ready to sell to a developer and this will continue to be the case. It is considered that 3 – 4000 dwellings might get developed along corridors in the 2021 – 2030 decade.

Whilst the Cheetham site has been identified as a future strategic infill site, why have other sites not be included? The Blair Athol / Kilburn renewal being undertaken by the South Australian Housing Authority is not mentioned. Other examples include the 15ha SA Water site on Frederick Rd West Lakes and the Metcash site at Kidman Park are known sites for future residential development even though they require a Code Amendment. We believe there are other sites that should also be considered. The report also does not mention how strategic sites were selected.

The remaining strategic infill sites in Table 9 total just over 12,000 dwellings/lots. Section 5 states the realistic short term dwelling potential from general infill is 68,200. However if the 40% assumption for the CVSVR of <1.3 is incorrect and is more like 20%, and the 20% assumption for the CVSVR lots between 1.3 – 1.8 is more like 10% then the general infill supply drops from 68,222 to 34,111.

With demand for infill in the High Growth Scenario (Table 6) across the Greater Adelaide Capital City area being 58,550 this essentially just meets the supply (under the scenario described above). If this scenario were to eventuate then there maybe price pressures arising which will make the delivery of affordable housing more difficult.

Land Supply Report for Greater Adelaide – Employment

There is a lack of analysis of how much land is needed for the population serving uses that typically locate on the periphery of centres, along arterial roads and in commercial and light industrial areas when population increases in areas (both infill and greenfield). These types of jobs are the largest number and are expected to remain so to 2030 according to Figure 10.

Commercial and Mixed Use Zones should be included in the analysis as they accommodate many jobs. Some areas in Inner Metro and Adelaide West and some in Inner South are no longer suitable for industrial and warehousing uses due to poor heavy vehicle access and the potential replacement jobs in knowledge intensive industries often don't see these locations as being suitable. There is no analysis for the Adelaide Hills, Northern Plains and Barossa, and Fleurieu areas. The section on Employment Trends is thin.

Environment and Food Production Areas Review 2021 – Statement of Position

Further to the earlier comments and attached legal advice, there are certain areas within Greater Adelaide that are expected to have supply challenges to a point that affordability issues will continue to arise. It is already almost impossible to develop three-bedroom housing within 10-15kms of the CBD that meet the affordable housing price point without external or internal subsidies. The lack of analysis of areas in terms infrastructure capacity is of serious concern.

The table below has used information from various tables in the Land Supply Reports and it shows that demand to 2036 is going to cause serious affordability issues unless land is rezoned to enable more development to occur in the Inner South and Fleurieu areas.

Area	High Scenario Dwelling Demand to 2036	Greenfield Development Ready/ Undeveloped Zoned lots	Realistic General Infill lots	Strategic Infill lots	Total lots
Outer North	25,300	46,300	4,434	0	50,734
Outer South	11,900	4,200	9,563	2,100	15,863
Inner North	20,600	0	28,285	12,400	42,685
Inner South	10,500	0	5,683	4,700	10,383
Adelaide West	24,500	0	11,100	20,000	31,100
Inner Metro	22,000	0	8,798	28,200	36,998
Adelaide Hills	6,200	13,000	359	300	13,659
Fleurieu	7,800	7,500	?	?	7,500+
Northern Plains / Barossa	3,500	4,700	?	?	4,700+
Murray Bridge	2,600	6,300	?	?	6,300+

If our analysis of a more realistic expectation of infill being able to provide supply is close to being correct then supply issues will occur in Inner South, Outer South, Fleurieu and Adelaide West, as well as the northern part of the Adelaide Hills.

There are a number of places where the EFPA boundary dissects cadastral boundaries (eg: One Tree Hill, Inglewood, Lobethal, Summertown, Mount Barker and Ashborne). The EFPA should not arbitrarily dissect cadastral boundaries as this can lead to confusion as to the process for any land division application.

Recommended Actions

The key objective for the State Government should be to have a better approach to having a quality land supply process that leads to having the capacity to deliver affordable housing in all areas. This will require better and more timely data analysis which should be much simpler to achieve now the e-planning system is in place. Updated data and analysis for the Land Supply reports is needed in the next year. We cannot wait another five years for this to occur.

The following actions are considered necessary:

- Revise the EFPA report once the Land Supply Reports are updated so that analysis of the supply / demand for each of the ten areas is undertaken
- The Outer South needs more than 1000 lots rezoned in the very near future to minimise the affordability issue due to a lack of supply.
- Long term supply (beyond 2030) needs to be considered in the Outer South beyond Hackham, Aldinga and Sellicks Beach.
- A review of the peri-urban township boundaries is required.
- A more refined analysis of urban infill potential is required.
- More strategic infill sites need to be identified and rezoned.
- Infill potential in peri-urban areas such as townships in the Adelaide Hills area is required to be investigated.
- Alternatives to the one into two infill developments are needed which should include masterplanning infill areas under multiple ownerships where individual development attends to the upgraded infrastructure requirements.
- The zoning policies across large areas of Adelaide West, Inner Metro, the southern half of Inner North, Inner South needs amending if demand for infill is to be achieved.
- Better capacity analysis of infrastructure is required in both infill and greenfield locations
- PLUS to devise and implement a housing demand and supply monitoring program using live data and reporting publicly on a quarterly basis in conjunction with the UDIA

DTI:PlanSA Submissions

From: Urban Future Exchange [redacted]
Sent: Monday, 6 November 2023 12:55 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: Planning a Greater Adelaide - UFX Submission on the Greater Adelaide Regional Plan.pdf

You don't often get email from [redacted]. Learn why this is important

Good afternoon,

Please find attached the Urban Future Exchange's submission regarding the Greater Adelaide Regional Plan Discussion Paper.

If there are any points raised in the submission that you would like us to clarify or expand upon, we would be more than happy to.

Thank you for all of your work so far, and we look forward to seeing the engagement report and draft plan in due course.

Thanks,
Ned Feary

Planning a Greater Adelaide - UFX Submission to the State Planning Commission on the Greater Adelaide Regional Plan

Dear Commission Members

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan Discussion Paper (Discussion Paper). UFX congratulates the State Planning Commission (Commission) on the work undertaken to date and the commitment to engage with the South Australian community on this paramount plan for the State.

Urban Future Exchange (UFX) is a provocative and politically savvy social enterprise, leading progressive discussion in urban studies and related disciplines, in pursuit of an urban future for South Australia that is healthy, confident, equitable and sustainable.

Our membership is broad and balanced and includes individuals and corporate associate members from the public, private, not-for-profit and academic sectors. Our members have qualifications and expertise in urban planning, law, design, industrial design, business, health, sustainability, industry and policy amongst many others. As such, the UFX provides a unique and diverse view on South Australia's urban and regional future.

UFX has a strong interest in the development of the Greater Adelaide Regional Plan as it will significantly shape the way our urban future is planned and realised.

UFX's submission is targeted and primarily seeks to add value to the conversations that will occur during the development of the draft Plan.

Outcomes for Greater Adelaide

Proposed Outcomes

The four outcomes proposed by the Commission are sound and supported in principle. UFX makes the following suggestions for consideration:

1. There should be *a greater choice of housing that is **affordable** and in the right place.*
2. Access, which is critical to urban and regional planning, and central to the *Living Locally* theme, is currently underrepresented in the outcomes, and in the paper more broadly. UFX believes there are two ways that this can be addressed:

    a. Reshape the *A more equitable and socially - cohesive place* outcome to have greater focus on access; or

b. Create a fifth outcome with a title such as; *A region where housing, employment and services are easily, timely, sustainably and affordably accessed.*

Major trends and drivers

The major trends and drivers are sound and supported in principle. UFX suggests population and demographic trends should also be considered. In particular;

- South Australia's ageing population is likely to prefer smaller, more compact housing within established residential areas that are also very close to services, public transport and areas of high amenity.
- South Australia's young people, particularly those that are at risk of leaving the State, are likely to prefer smaller, denser urban areas with strong immediate access to diverse events and experiences.
- There should be greater diversity and flexibility in housing to cater for all stages in life.

Planning the densities we need

UFX is supportive of infill and greater densification across Greater Adelaide. Densification can:

- enable greater utilisation of existing infrastructure;
- increase active and public transport use;
- reduce pressure on valuable agricultural and natural land;
- create more dynamic and interesting urban environments;
- stimulate local businesses; and
- foster better community health and wellbeing.

Density is also important in ensuring the financial viability of public services, as shown through the work of organisations like Urban3 in the USA.

Much has been made in recent years about the importance of infrastructure coordination. This is reflected in the Discussion Paper, but UFX is concerned about the practicalities of this.

The 30 Year Plan for Greater Adelaide was accompanied by the Integrated Transport and Land Use Plan. UFX believes that this integration was the correct approach, but unfortunately this was never fully implemented. A fully coordinated land use and infrastructure strategy should be the goal for such regional plans.

Fundamentally, infrastructure coordination is much easier when that infrastructure already exists. This is why UFX believes that infill development should be prioritised over Greenfields development.

The principle of transparency of costs is also strongly supported. Factoring in lifecycle costs from the beginning, rather than focussing purely on capital costs is an important part of good long term planning.

Planning the housing we need

UFX is supportive of greater housing diversity across Greater Adelaide, including;

- greater choice of housing types in *all* places.
- greater access to affordable housing in *all* places.

Applying the right housing diversity policies in the right locations is paramount. Along with familiar housing types such as semi detached dwellings, apartment buildings and etc, below are a number of innovative ideas/examples that could also be viewed as also suitable for wide range of locations:

- Enabling ancillary dwellings (granny flats) on larger sites (i.e. >600m) with low site coverage ratios (i.e. <50%). Greater Adelaide has an abundance of sites like these in the middle and outer ring suburbs that could easily accommodate affordable ancillary dwelling units.
- Enabling house over garage/mews dwellings on lots that are rear/side loaded (have vehicle access from a laneway or other form of access).
- Converting existing dwellings into two or more dwellings. This option would suit dwellings/areas where preservation is emphasised and/or demolition is restricted/prohibited. This would also provide affordable rental outcomes in well-established and/or higher land value areas.The reverse would also be possible, should market demand drive such an outcome.

UFX believes that further consideration needs to be given to how to better encourage an ecosystem of small and medium sized developers. This will allow for better risk distribution across the development sector, as well as allowing for more innovative practice.

Planning the transport options we need

UFX is supportive of focussing development along transport spines. However, it is imperative that growth is focussed on public transport and active transport spines, not only car transport / road spines, as canvassed in the Discussion Paper.

The focus on road spines is contradictory to a number of paramount principles, including:

- climate change mitigation,
- better utilisation of existing infrastructure and services,
- better health and wellbeing
- equitable and affordable access and choices, and
- increasing public and active transport amongst many others.

The Discussion Paper notes that 29% of the state's carbon emissions come from the transport sector, and it is inarguable that a significant portion of this comes from traffic within Greater Adelaide. A focus on carbon emissions, however, hides the other implications of car-dependent development, including:

- Air pollution from vehicle tyres;
- Underutilised land for roads and parking areas;
- Social isolation for people who cannot drive; and,
- Increased cost of living due to the cost of running a car

UFX believes that increasing the modal share of bike riding and walking is essential to a sustainable urban future. UFX has previously provided submissions on the draft SA Cycling Strategy and the draft Walking Strategy, which explored this further.

As noted above, our present system of disconnected strategies is a missed opportunity for an integrated strategy setting which can facilitate better outcomes. This is particularly true for active transport, where the disjointed network fails to take advantage of the many benefits of these modes.

Focusing infill development in areas with quality active transport infrastructure (e.g. along the Linear Park Trail) would be a step towards achieving a better outcome. Furthermore, leveraging substantial infill developments as an opportunity to improve active transport links through street upgrades and public realm improvements, will be important.

While housing will naturally take all the headlines when it comes to affordability, Australians spend an average of 14.9% of their income on transport, and the average Adelaidean in 2022 spent $17,785.56 on running their car according to BudgetDirect. Fuel price increases are a major part of the current cost of living crisis, which shows little sign of easing.

Diversifying our transport options, and allowing households to live “car-lite”- with no or one car per household, rather than one car per person- would allow for significant savings for household budgets. However, people need to have the confidence in alternative modes of transport to be able to make this decision.

Ultimately, we need to shift away from car-dependent suburban development. The GARP should address how this can be achieved.

Planning a greener, wilder and resilient environment

Climate change is naturally a vital consideration in the GARP. It, and other planning documents and tools which rely upon it such as the Planning and Design Code, must do more to both mitigate, and adapt to, climate change.

The planning system should encourage innovation in sustainability (noting that this is not solely climate related outcomes), and there is a role for larger developments to act as "role models" to show the sector more broadly what can be achieved.

UFX believes that there are a series of key measures that can contribute to this outcome.

Firstly, UFX believes that more needs to be done to increase urban tree canopy, and pervious surfaces, with the greatest opportunities for impact being on private land.

UFX notes infill development is usually characterised as the primary cause of tree canopy cover loss. Infill development is not the cause of this, insufficient tree policies are. UFX would like to see better tree protection policies in place, not the loss of urban infill. UFX made further commentary on these points in our submission to the Planning System Implementation Review Expert Panel.

Greenfields development also presents environmental challenges, and UFX is concerned about this in some way being viewed as an "environmentally friendly" option. UFX is concerned about this disconnect between this outcome, and the focus in the Discussion Paper on greenfields development and satellite cities, given the car-centric spines proposed.

Increasing urban density must lead to improved public open spaces. Increasingly, people look for "low maintenance" living options, which means less private open space, but a greater demand on hgh quality and green public open space. It is also important that this is appropriately channelled into the areas that really need it.

Protecting mature trees in greenfield areas should be a particular priority as they provide an important element of maturity in an otherwise "young" area. It is imperative that masterplans plan around mature trees, and incorporate them into new areas of open space.

Planning a smarter cleaner regenerative future

UFX is supportive of planning for a strong economy built on a smarter, cleaner, regenerative future; including:

- Maintaining a strong distribution of employment land around Greater Adelaide;
- Not enabling significant loss of employment lands for the purposes of infill development, this is discussed further below;
- Sufficient supply of housing that is affordable for the workers required to deliver economic growth, particularly in growth industries; and
- Ensuring a healthy mix of land uses in every neighbourhood.

UFX is pleased to see consideration given to well distributed employment lands throughout the Greater Adelaide region.

UFX notes the inclusion of "Local Learning Opportunities" as one of the *Living Locally* Principles. UFX believes that present work in this area is relatively successful. In an infill context, the continuing ageing of Greater Adelaide's population will mean that while population increases will increase demand for educational institutions, this will be balanced by a lower proportion of the population being of school age. Nonetheless, robust demand forecasting in both infill and greenfields areas will be crucial to achieving this principle.

How and where should Greater Adelaide grow?

To positively advance the discussion on how Greater Adelaide should grow, UFX drew upon key themes from State Planning Policies, the GARP Discussion Paper (including the *Living Locally* principles), and general principles of sound strategic planning, and developed a list of simplified growth prioritisation objectives.

UFX then assessed key growth types against these growth prioritisation objectives, which ultimately delivered a ranked priority for each growth type. The higher the ranking, the higher the priority and the lower the ranking, the lower the priority.

UFX notes that not all growth can be accommodated in the highest ranking growth types and that growth will likely need to be pursued through most, if not potentially all growth types in some form or shape. Whilst Adelaide City Centre is the highest priority, it would be impossible for the Adelaide City Centre to accommodate all of the region's projected growth- nor would this likely deliver the kind of equality and diversity in housing choice that is required.

Growth, based on ranking and size of growth type area, is most likely to be accommodated via master planned infill development, urban corridor development, regenerated neighbourhoods and urban activity centres and general infill. There will be some circumstances where satellite and general greenfield development is suitable, these are discussed further below.

Assessment of how and where Greater Adelaide should grow

Development type's contribution to Growth Prioritisation objectives				
High	Med-High	Medium	Low-Med	Low

	Infill					Greenfield	
Growth Prioritisation Objectives	**City Centre**	**Master planned**	**Corridor**	**Regen**	**Small-scale**	**Satellite City**	**General**
Greater number of affordable housing outcomes	3	1	2	1	0	1	1
Greater housing type diversity to accommodate all stages and choices in life	0	1	3	1	3	0	0
Greater utilisation of existing services and infrastructure to reduce emissions and costs (capex and opex)	1	2	1	2	3	0	-1
Greater accessibility, including reduced travel times to employment areas, services and other needs	1	2	2	3	3	0	-1
Greater public transport use to reduce emissions and transport costs and improve public transport services	2	2	1	3	3	-1	-1
Greater cycling and walking to improve health and wellbeing and reduce emissions and transport costs	1	2	2	3	3	0	-1
Greater access to high quality public and private open space to improve health and wellbeing	1	2	-1	3	0	1	1
Greater greening to mitigate effects of climate change and cool the environment	2	1	0	3	-1	0	0
Greater protection of employment and production/productive areas	1	0	2	1	1	0	0
Greater population intensity to help drive new and diverse experiences, enterprises and economic growth	1	2	2	3	0	0	-1
RANK	**1**	**2**	**3**	**4**	**5**	**6**	**7**

Note: Objectives were equally weighted

Growth priority 1: Adelaide City Centre

- The Adelaide city centre is an important contributor to infill growth. It is the heart of our State's civic, cultural and commercial life and more people should be living, working, and visiting the Adelaide City Centre.
- The city centre should be the highest priority for future growth because of significantly high alignment with growth prioritisation objectives.
- Whilst the city centre should be prioritised, it will likely be a smaller contributor to accommodating future growth.
- UFX would like to see the Commision work closely with the City of Adelaide to maximise growth potential in the Adelaide City Centre and considers the development of the new City Plan as an excellent opportunity to pursue this further.

Growth priority 2: Master planned infill projects

- Developing larger strategic infill sites, particularly in the inner and middle ring areas through master planned approaches, enables better planning and delivery of more:

    - diverse and affordable housing;
    - potential for multi use developments
    - greening and open space;
    - effective stormwater solutions; and
    - access and mobility options.

- Master planned infill projects should be prioritised for future growth because development is highly aligned to growth prioritisation objectives.
- UFX considers the next generation of master planned infill sites will continue to emerge, particularly in the inner-middle ring western, southern and northern suburbs, as employment lands are self rationalised over time. Next generation sites can also be created through increased site amalgamation, potentially encouraged by incentive policies and other tools.
- Whilst master planned infill should be prioritised, it will likely be a smaller contributor to accommodating future growth.

Growth priority 3: Urban Corridor Development

- Urban corridor development enables more homes to be located near high-frequency public transport, which offers more choice in how to move around. It also provides more affordable and diverse housing choices near existing jobs and services in inner and middle ring suburbs.
- Urban Corridor Development should be prioritised for future growth because development is highly aligned to growth prioritisation objectives.
- UFX is supportive of two types of corridor development:

    - Lower scale next to established residential land uses
    - High scale where there are fewer sensitive interface issues

- UFX is generally supportive of proposed areas of investigation - but also believes the Commission should explore parts of corridors that are perpendicular to those corridors identified. To name a couple of quick examples, in Adelaide's west, the following corridors and corridor sections might also be suitable for lower scale urban corridor development.

    - David Tce near the Kilkenny Train Station and Arndale
    - Findon Road in Findon
    - Crittenden Road in Findon

- UFX believes all areas where there is a 15 minute go zone should be added to the urban corridor development investigation areas.
- UFX believes sections along greenways, for example along the River Torrens Linear Park, should also be added to urban corridor development investigation areas.
- UFX believes that there is an important opportunity to also align corridors to railway corridors, as well as road corridors, as these also provide high quality public transport links that are aligned to strategic priorities. These will not necessarily be high-rise in nature, given the higher propensity for interfaces with established neighbourhoods, but can be of a higher density, providing greater housing diversity.
- Some of the identified potential corridors present a low level of public realm amenity. Any attempt to create an urban corridor in such areas must be accompanied by strong and well-coordinated efforts to improve the quality of the public realm, and ensure that these corridors are desirable places to live, walkable outcomes along the corridor would encourage this and further support the development through improved access to existing and future amenities along the corridor.
- UFX believes urban corridor development is an important and potentially significant contributor to accommodating future growth and investigations of this type should be expanded and maximised,
- UFX also believes further exploration can be done on other housing typologies along corridors that would better support living locally outcomes as the emerging perpendicular apartment blocks which dominate this sector do little in encouraging social interaction and wellbeing.

Growth priority 4: Regenerated neighbourhoods and urban activity centres

- Regenerated neighbourhoods and urban activity centre development can provide more diverse and affordable housing options, utilise existing infrastructure investment and services (e.g. public transport, recreation, education, and medical facilities) and in some locations, provide access to a wide variety of retail and services.
- Regenerated neighbourhoods and urban activity centres should be prioritised for future growth because development is well aligned to growth prioritisation objectives.
- UFX is supportive of proposed areas for investigation but adds that investigation areas, particularly around major activity centres, could be expanded even further. This approach would support the pursuit of a more polycentric urban planning

approach, which would generate many strategic urban planning, mobility and access benefits across Greater Adelaide.
- Building on findings of the Adelaide City Plan, access to amenity encourages development, therefore strategic investment in amenity and accessibility would directly link to heightened development around urban activity centres. UFX therefore encourages significantly greater alignment between GARP and state and local government investment plans.
- UFX believes regenerated neighbourhoods and urban activity centres are an important and potentially significant contributor to accommodating future growth.

Growth priority 5: Small-scale infill

- Small-scale infill, such as the division of existing allotments into 2, 3, or 4 smaller allotments, makes a significant contribution to renewing the overall housing base and creating additional housing supply.
- UFX is supportive of small-scale infill, with the right design policies in place.
- UFX believes it is a relatively important and significant contributor to accommodating future growth as it leverages existing amenities and transport links and should continue to be supported in the future.

Growth priority 6: Satellite City

- A satellite city is a smaller city located on the fringe of a capital or major city. They are self-contained cities offering residents and surrounding districts a broad range of local jobs, services and amenities.
- Satellite city development should not be prioritised for significant future growth because development is not well aligned with growth prioritisation objectives. There are many issues in relation to many of the objectives, including low levels of existing infrastructure utilisation, accessibility, public transport, walking and cycling activity, etc.
- UFX believes it has a low level of importance and should only contribute to accommodating future growth if:

    - growth cannot be accommodated in higher priority areas or through higher priority development types; or
    - There are compelling economic reasons, such as supporting industry to grow in a particular location.

Growth priority 7: General Greenfield Development

- Greenfield development is the urban development of broad hectare land. It often occurs on farming land on the edge of established residential areas.
- General greenfield development should not be prioritised for significant future growth because development is not well aligned with growth prioritisation objectives. There are significant issues in relation to many of the objectives, including low levels of existing infrastructure utilisation, accessibility, public transport use, walking and cycling activity, population intensity and loss of employment lands, etc.

- UFX considers there may be some locations where Greenfield development could be prioritised. One example of this is around Kudla in Adelaide's North. This could provide opportunities for master planned communities with population and dwelling densities that would support walkable communities, including strong utilisation of existing infrastructure, namely the Gawler Rail line.
- As noted earlier in our submission, UFX believes that there are substantial issues with the other "spines" identified in the discussion paper, and is concerned that the cost of infrastructure required, and the lack of access by any means other than a car, would make them unviable.

Further Prioritisation

Within these priorities, UFX believes the following objectives should be utilised to assess how future growth can be accommodated.

- Resilience to the effects of climate change;
- Consideration of Aboriginal significance, and how this can be reflected within our planning system;
- Consideration of local urban design and interface issues;
- Minimising need for additional infrastructure investment; and
- Accessing existing open space - or appropriately introducing new open space.

Looking forward

Thank you for the opportunity to provide this submission.

UFX is looking forward to engaging further on development of the Greater Adelaide Regional Plan.

If you would like to discuss this submission in further detail or any other matter, please don't hesitate to contact UFX by email [redacted]

Ned Feary
Urban Future Exchange
https://ufx.org.au/

From: DTI:Plan SA
To: DTI:PlanSA Submissions
Subject: FW: Greater Adelaide Regional Plan Discussion Paper - WMRR submission
Date: Monday, 6 November 2023 4:55:07 PM
Attachments: image001.jpg
Greater Adelaide Regional Plan Discussion Paper - WMRR submission .pdf

OFFICIAL

Hi Team,

Just forwarding the below email as it has come to the PlanSA inbox

Reference Number: 77028

Kind Regards,
Vu | Customer Support Officer
Planning & Land Use Services | Department for Trade and Investment
E PlanSA@sa.gov.au |W plan.sa.gov.au

From: [redacted]
Sent: Monday, November 6, 2023 4:40 PM
To: DTI:Plan SA <PlanSA@sa.gov.au>
Cc: [redacted]
Subject: Greater Adelaide Regional Plan Discussion Paper - WMRR submission

You don't often get email from [redacted]. Learn why this is important

Dear Planning and Land Use Services,

The Waste Management and Resource Recovery Association of Australia (WMRR) appreciates the opportunity to provide feedback on the *Greater Adelaide Regional Plan Discussion Paper*.

Please do not hesitate to get in touch if you would like to further discuss WMRR's feedback. Thank you.

Warm regards,
Romany Maunder *(She/Her)*
Manager, Policy and Governance, and Secretariat
T [redacted]
M [redacted]
E [redacted]

Waste Management & Resource Recovery Association of Australia
Gadigal Country, Eora Nation | 57 St Johns Road | GLEBE NSW 2037 | www.wmrr.asn.au
The national peak body for the waste and resource recovery industry

Mr David Reynolds
Chief Executive
Department for Trade and Investment SA
250 Victoria Square/ Tarntanyangga
Adelaide South Australia 5000

Email: PlanSA@sa.gov.au

6 November 2023

Dear Mr Reynolds

Re: Greater Adelaide Regional Plan Discussion Paper

Thank you for the opportunity to provide feedback on the *Greater Adelaide Regional Plan Discussion Paper*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's $15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. WMRR's members are involved in the breadth and depth of waste management and resource recovery, engaging in significant activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residuals and problematic wastes.

An integrated WARR system is good for both the environment and the economy, given that it drives jobs and economic growth. At present in South Australia (SA), WARR activity directly and indirectly employs around 5,000 people with an annual turnover of greater than $1 billion and contributes around $0.5 billion to Gross State Product.[1][2] SA also leads the nation in its levels of resource recovery, with a rate of 81.9% reported for 2021-22. With almost four (4) million tonnes of materials recovered from households, businesses and construction activity processed locally through SA facilities resulting in a reduction of greenhouse gas emissions by 1.31 million tonnes of CO2-e.[3]

The built environment will be integral to SA's transition to a circular economy. A circular economy recognises the true value of resources and materials and aims to keep products and materials at their highest value for as long as possible to reduce the amount of virgin material that is needed. It incorporates aspects like original product design, sharing, repair, re-use and, only after these higher value steps, recycling, and resource recovery. By keeping these materials circulating, there is the additional benefit of reduced reliance on virgin materials (which can be accompanied by land clearing

[1] South Australia's Waste and Resource Recovery Infrastructure Plan, Green Industries SA 2018
[2] South Australia's Waste Strategy 2020-2025, Green Industries SA 2020
[3] Green Industries SA, Circular Economy Resource Recovery Report 2021-22.

and loss of biodiversity), as well as reducing carbon and methane emissions, which will be key to also meeting 2030 carbon commitments of 43% reduction on 2005 levels.

The Greater Adelaide Region Plan needs to include clear recognition that with the proposed population growth and increase in urban areas there will be an accompanying increase in waste material, including hazardous wastes, which have no potential for beneficial reuse, and that the well-planned provision of suitably located facilities for the collection, aggregation, processing, treatment and disposal of such wastes is essential for both the environment and the continued operation of industry. The development of such facilities requires appropriate planning (land use and transportation) as well as buffers, given that there can be high levels of sensitivity to encroachment. In WMRR's view, the Plan urgently needs to recognise that the WARR industry provides essential services to the community, in the same manner as other forms of infrastructure are referenced.

The criticality of the WARR sector has been tragically highlighted by natural disasters and the pandemic in recent years. These have resulted in the creation of large volumes of waste needing removal and differing disposal treatments at scale. Strategic planning that includes the recognition of both business-as-usual growth as well as these types of surges needs to occur, to ensure there is resilience across WARR networks and help protect the accessibility and useability of infrastructure. It is vital that the SA Waste and Resource Recovery Infrastructure Plan and the Waste Strategy be incorporated into this plan and echo connected sentiments, given the vital role that this Plan plays in establishing and supporting the continued growth of Greater Adelaide to ensure that it does remain a liveable city.

The importance of waste and recycling services and the need to consider this in initial design and strategic planning is too important to leave to the goodwill or ad hoc approach of individual developers, councils and projects. It requires a systems level approach to be effective and safeguard the minimum standards the WARR industry needs to deliver its services to the Greater Adelaide community.

WMRR's responses to the consultation questions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

[redacted]

Gayle Sloan
Chief Executive Officer
Waste Management and Resource Recovery Association of Australia

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Annexure A

Submission:

What do you think of the four (4) outcomes guiding how Greater Adelaide should grow? Are there any other outcomes the commission should consider? What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?	Adelaide has a terrific opportunity to ensure that it remains a liveable city to live, work, play and stay, by focusing on its natural environment and continuing to build on its strong planning foundations including land use and considered transport networks. An increased emphasis on reducing carbon emissions by preferencing local recycled materials, managing materials close to generation (the proximity principle) and planning resource recovery precincts to keep material out of landfill and reduce native vegetation clearing (also reducing methane emissions). All of the above can be assisted by a clear and specific definition of what the circular economy is, why achieving a greater level of circularity is critically important and how planning and development processes and outcomes play a key role in achieving circularity need to be incorporated into the plan. WARR infrastructure like power, water, sewer and social infrastructure needs to be planned for at the outset with our spatial footprint located throughout the region that it serves. It is not appropriate to 'push the industry out' (proximity principle), into the regions without adverse commercial and carbon impacts. Further by doing so, it negates the opportunity to create resource recovery/ recycling hubs that enable the creation of secondary material to use in local manufacturing and create local SA jobs.
What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment?	As well as the elements mentioned above (e.g. the use of recyclate in the built environment, reducing land clearing and reliance on virgin material as well as carbon and methane emissions), the plan should recognise the relationship between design and construction of built form to future generation of waste and the role that the built environment sector can play in reducing the future generation of waste, amount of embodied energy and carbon emissions. The plan could promote design requirements that drive the prioritised use of recovered materials in buildings and infrastructure as well as future reusability and recoverability. Recovered materials need markets for their use in a circular economy while design and material choices determine the

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	flexibility of buildings for greater longevity and the ability for their components to be recovered at end of life.
What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?	The Plan could be a blueprint for equitable and consistent management of WARR material by clearly identifying at a strategic level the land use precincts where WARR facilities could be developed that service the Region equally, and also by establishing clear planning guidance as to the standards required to be complied with statewide, for all built environments and roads/ streets to gain equal access to collection services. This would support collection logistics through building and transport network design requirements. Subdivision design, road widths and traffic flows need to support the ready movement of waste and resource recovery trucks – both for standard households and once aggregated for long-haul transport to key large scale facilities. The availability of adequate space in buildings for the separation and storage of materials is critical to enabling the sustainable management of waste and resources. The plan could improve policy support with specific reference to 'living' documents for good design outcomes to support waste and resource recovery outcomes. Specific policy for other forms of development, such as residential, retail, office, medical/consulting room, education and community uses should be referenced in strategic and statutory policy but could exist in standalone policy documents which can be updated outside of Strategic Planning and Code Amendment process.
What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?	Establishment of suitable zoning to support more resource recovery and circular economy hubs. There are significant employment and economic benefits from co-locating different WARR infrastructure together (as occurs in the Wingfield precinct for example) and this could be further driven with planning for circular economy hubs, where manufacturers who can reuse materials or use recycled materials, are supported to co-locate given that the recovered materials will act as inputs into their processes.
What else could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?	Initial planning and design must consider resource consumption in both the physical design of buildings and public infrastructure and the materials they consume but also the day-to-day life of communities and the choices they make. Aspects like encouraging public and active transportation, easy access to community facilities like repair cafes, share libraries,

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	salvage shops and recycling facilities (container deposit scheme drop-offs, hazardous household waste disposal points etc.) are needed to maximise the use of resources, but they also foster community connectiveness and capacity building- essential elements to building strong communities.
What neighbourhood features enhance living and working locally?	Current strategic and statutory policy positioning offers no material support for development which facilitates reduced consumption/ reuse or recycling. At present policy relating to residential development is typically focussed on the direct logistics of waste collection but offers little policy support for outcomes which reduce waste generation in the first place. The built environment has enormous amounts of embedded materials and energy. The current system of demolition and downgrading materials takes additional energy and loses much of the embedded value in those materials. Retaining the value of these materials in their current form can be encouraged through modular design and building techniques that allow for de-construction and reuse. De-construction will also allow items that cannot be reused to be separated more easily so they can be recovered into higher grade products (instead of mixed materials).
How can infill development achieve an urban form that is consistent with the principles of Living Locally? What do you see as the benefits and potential drawbacks of infill development?	It is vital that infill development maintains character and amenity, and where possible can be done with minimum disruption, yet meet the requirements of liveability including open space, energy efficiency and climate considerations. Ideally vertical development can be used that will enable green space and tree canopy to be maintained, as well as an increased emphasis on using recycled material and ensuring that appropriate WARR collection infrastructure can be both enhanced and serviced. WMRR seeks that guidance materials produced for Green Industries SA, such as the Better Practice Guide for Waste Management in Residential & Mixed Use Developments (2014), be utilised.
Where is the next generation of strategic infill sites?	Ideally the next generation of infill sites will be located adjacent to existing transport and community infrastructure (referenced as established urban area) to avoid further sprawl and the need for further large infrastructure investment. As such, WARR infrastructure needs to be located where it can continue to efficiently service its community and enable further investment.

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	To this end, existing facilities need to be appropriately protected from encroachment by future development, particularly the creation of additional sensitive receivers, to avoid interface issues arising. This needs to include maintenance of the separation distances recommended by the EPA through zoning to prevent environmental interface issues (such as noise, dust, traffic or odour) arising due to land use changes. Planning needs to establish suitable locations for new infrastructure, including those which generate impacts to be located, convenient to the communities they serve and their logistic pathways. As Adelaide grows, there will be a need for new transfer stations and resource recovery facilities to ensure that communities have access to efficient and accessible waste and resource recovery services.
What are the most important factors for the Commission to consider in meeting future demand for employment land?	Affordable housing to ensure that these precincts have a pool of workers that can access the employment land.

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From: [redacted]
To: DTI:PlanSA Submissions
Cc: [redacted]
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 4:24:21 PM
Attachments: GARP Water Sensitive SA submission - 6Nov23.pdf

You don't often get email from [redacted]. Learn why this is important

Dear Mr Holden,

Thank you for the opportunity to provide a submission on the Greater Adelaide Regional Plan Discussion Paper.

Water Sensitive SA supports government, industry and community to mainstream water sensitive urban design and integrated water management practices that enhance wellbeing and ecological health.

Please find attached our detailed feedback for your consideration.

Kind regards,
Belinda

Belinda Dohring | Program Manager
Water Sensitive SA | PO Box 351, Uraidla SA 5142
[redacted]
www.watersensitivesa.com

6 November 2023

Mr Craig Holden
Chair
SA Planning Commission
plansasubmission@sa.gov.au

Dear Mr Holden

Greater Adelaide Regional Plan Discussion Paper

Water Sensitive SA welcomes the opportunity to contribute to a new regional plan for Greater Adelaide. We reinforce the importance of sustainable, diversified and fit-for-purpose water resources through integrated water management and water sensitive urban design (WSUD) to support a liveable and thriving urban environment in the face of a changing climate.

The following key points are critical for the Greater Adelaide Regional Plan to achieve the primary object of the Planning, Development and Infrastructure Act, which is to support the state's liveability and prosperity in ways that are ecologically sustainable (PDI Act s12(1)):

1. **Consistency with the pending Resilient Water Futures Urban Water Strategy** – urban water services and growth (infill and greenfield) must be strategically aligned.
2. **Sufficient space allocated for stormwater treatment and harvesting** – structure plans and master planned communities must be designed with enough space to protect and regenerate urban ecosystems.
3. **Protection of waterways and existing drainage lines** – encroachment must be minimised to allow expanded urban greening, recreational activities and natural systems so that multi-beneficial outcomes are delivered for communities.
4. **WSUD is an opportunity to adapt to climate change** – resilience of natural systems in a warmer, drier future climate will mitigate health and economic impacts.

The four points above are fundamental to achieving the outcomes of the Greater Adelaide Regional Plan and more specifically, these State Planning Policies:

- A greener, wilder climate resilient region
  - SPP1 – Integrated planning
  - SPP4 – Biodiversity
  - SPP5 – Climate change
  - SPP12 – Energy
  - SPP13 – Coastal environments
  - SPP14 – Water security and quality
  - SPP15 – Natural hazards

- A more equitable and socially cohesive place
  - SPP7 – Cultural heritage

- A strong economy built on a smarter, cleaner, regenerative future
  - SPP5 – Climate change

Strategy and planning policy that regards stormwater as an asset to urban communities and integrates sustainable water management should be widely promoted in the new Greater Adelaide Regional Plan. Without this, we risk missing vital opportunities to expand urban green cover, achieving liveability and affordability, and supporting the community's disaster preparedness. Future generations must be protected from decisions made today that burden them with the socio-economic and environmental impacts that can be avoided by good strategy and policy planning.

Adopting Water Sensitive SA's four key points above and strengthening them within the Greater Adelaide Regional Plan will deliver maximum benefit for communities through creation of linear open-space corridors adjacent waterways for recreation, increasing biodiversity, and protecting downstream catchment environs from flooding, pollution and environmental degradation. Together these key points further reinforce climate change adaptation measures to address impacts such as urban heat island effects.

Strategic urban water resource planning and investment must be central to the Greater Adelaide Regional Plan to ensure Adelaide maintains its renowned status as a liveable and healthy city.

If you require any clarification of the comments provided as part of this submission, please contact the Program Manager, Belinda Dohring, [redacted]

Yours sincerely

[redacted]

Dr Sheryn Pitman
Chair
Water Sensitive SA Steering Committee

Greater Adelaide Regional Plan

Water Sensitive SA submission 6 November 2023

Part 1. How should Greater Adelaide Grow?

A greener, wilder and climate resilient region

Priorities and directions

SPP1 – Integrated Planning (ref. page 54)

General comment: An active urban form will necessitate cooler, shadier streets and public spaces to attract people outdoors, particularly in hotter, drier conditions. Water sensitive urban design (WSUD) is one way to ensure sustainable water supplies support greening for high-quality amenity in neighbourhoods and at local parks.

Issues for consideration:

- Existing open space networks need to support a diversity of values including passive transport corridors, recreation, amenity, biodiversity and stormwater conveyance.
- Capitalising growth near these networks will add pressure to existing assets.

Recommendation:

1. Ensure WSUD is one of the criteria in the benchmark assessment for walkable communities.
2. Expand open space networks in growth areas and ensure investment in the quality of these spaces supports increased use due to urban growth.

SPP4 – Biodiversity (ref. page 55)

General comment: Existing water courses and riparian zones support diverse habitat and ecosystems, often being the only remaining corridor of connected natural landscape in the Greater Adelaide metropolitan area. Greenbelts will become vital to the capability of biodiversity to adapt to climate change as the urban form changes.

Issues for consideration:

- New urban development should seek to maintain, or create, new biodiversity corridors to link existing open space through the built form design. This could be achieved using surface-level WSUD and open stormwater drainage channels within divisions (rather than traditional underground pipe networks) to establish constructed linear parks.
- Bringing water to the surface will attract a more diverse range of flora and fauna.
- Climate change resilience and extreme hazard (bushfire/flood) protection can be enhanced by expanding biodiversity and watercourse buffer zones to prevent development encroachment.

Recommendations:

1. Additional idea for GARP – Establish an expanded network of linear parks along drainage lines and watercourses to support biodiversity adaptation and connectivity.

SPP5 – Climate Change (ref. page 55)

General comment: The impact of climate change on water resource sustainability is projected to result in a drier environment (particularly during spring) with more intense rainfall events.

Urban greening is a key climate adaptation response in Greater Adelaide, which also contributes to emissions mitigation. Recognising the role WSUD plays to underpin expanded urban tree canopy is strongly supported.

Issues for consideration:

- The resilience of urban trees will rely on access to climate independent, sustainable and diverse water resources that are integrated to enable agility in providing fit-for-purpose supplies. The extreme climate scenarios of El Nino and La Nina conditions (and projected changes to annual rainfall patterns) should be considered to ensure resilient urban greening.

Recommendations:

1. Expand the tree canopy criteria to consider tree resilience and access to fit-for-purpose water to ensure urban tree canopy performance assessment is more sophisticated than a map indicating the area of canopy coverage.

SPP 12 Energy (ref. page 56)

General comment: Energy is a key input of water production, distribution and wastewater recycling. Utilising at-source water supplies such as stormwater in street-scale WSUD features (tree inlets, raingardens, wetlands and swales) in urban development can support reduced energy demand for urban irrigation.

Issues for consideration: Water to cool the urban environment can help reduce energy demand and support climate equity in deploying adaptation strategies. Irrigated spaces, misting systems and open water bodies all offer alternative cool places rather than mechanical air conditioning.

Recommendations:

1. Additional idea for GARP – Seek to use at-source water supplies to reduce energy demands for the production and distribution of water resources for urban cooling.

SPP 13 Coastal Environment (ref. page 56)

General comment: Urban stormwater and treated wastewater discharged into coastal waters results in pollution of seagrass meadows and contributes to localised sand drift. Reducing the volume of discharge from these sources by capturing and harvesting stormwater and using recycled wastewater for irrigation will improve the health of coastal environments.

Issues for consideration: Expansion of recycled water infrastructure and harvested stormwater networks as part of integrated water supplies to be standard practice in future urban areas.

Recommendations:

1. Additional idea for GARP – Minimise the volume of water discharged into coastal environments by utilising it at-source, harvesting it or recovering it for other uses.

SPP 14 – Water Security & Quality (ref. page 56)

General comment: Urban development should be planned to ensure sustainable water supplies and urban water management contribute to the State Governments Resilient Water Futures strategy (under development, led by SA Water) as part of a holistic approach to becoming a water sensitive city.

Recommendation:

1. Additional idea for GARP – Ensure residential growth areas develop fit-for-purpose water resources, complementary to the Resilient Water Futures integrated water management plan for Greater Adelaide (under development).

SPP 15 – Natural Hazards (ref. page 56)

General comment: Urban flooding is correlated to the change in urban surface from permeable to impermeable. Minor events can be mitigated by enabling more infiltration of rainfall into soils, rather than directing run off to stormwater drainage systems, reducing flood risk during more intense rainfall events that are predicted due to climate change.

Issues to consider: Extreme rainfall events and La Nina conditions cannot be mitigated by increasing infrastructure capacity alone, as this may result in over-capitalisation of network investment and assets that are stranded during periods of unuse.

An integrated approach is required to ensure extreme stormwater events are mitigated at the lot, neighbourhood and catchment scale, and space is available within the urban form to attenuate water rather than accelerate it to coastal environments.

Recommendations:

1. Ensure hazard mapping and research data is readily available and shared for a common understanding of how to manage risks and ensure they are not simply transferred between water catchments or stormwater drainage networks.

A more equitable and socially cohesive place

Priorities and directions

SPP7 – Cultural Heritage (ref. page 63)

General comment: Recognising and protecting cultural heritage through better engagement with Aboriginal peoples and identification of sites and areas of significance is strongly supported.

Issues to consider: It must be recognised that the protection of cultural heritage is strongly connected with our ability to deliver integrated design solutions that protect drainage lines and waterways from encroachment of development, and hence provide opportunity for natural systems within our urban landscape.

A strong economy built on a smarter, cleaner, regenerative future

Regenerative planning (ref. page 69)

Restoration of creek lines and biodiversity corridors, WSUD for resilient urban greening and biodiversity, and rezoning degraded industrial sites are examples of regenerative practices.

This initiative is strongly supported as it is essential for the liveability of our communities. However, achieving this policy is contrary to the existing rate of urban development infill and the continually increasing impervious nature of the city. This goal will remain extremely challenging to deliver without a significant shift in the way we develop.

The total volume and rate of stormwater runoff from our urban landscape (infill and greenfield areas) is damaging the sustainability of urban waterways, and hence their ability to deliver the environmental benefit and amenity envisaged by the GARP.

Greater efforts must be made to ensure:

1. During the GARP process:
    - Future planning of land dedicated to stormwater treatment via wetlands, swales etc. must facilitate increased stormwater harvesting.
2. In the Planning and Design Code:

- Source control of stormwater via rainwater tanks (plumbed indoors in order of priority: Hot water service, laundry cold tap, toilets), infiltration systems on private property (if appropriate offsets from structures can be achieved) and within the road verge.
- Increase perviousness of driveways and carparks. A detention-only response to stormwater for commercial carparks is no longer acceptable practice.

SPP 5 – Climate Change (ref. page 70)

General comment: The CRC for Water Sensitive Cities 2017-2022 developed research, skills and technologies that have been exported globally to support economic growth and sustainability in regions where water resource planning is paramount.

Issues to consider: Integrated green and blue technologies support economic growth and resilience as the climate changes. Water resources are also a key consideration in energy, waste and transportation planning and development to mitigate climate risks.

Recommendation:

1. Additional idea for GARP – Identify opportunities for integrated water management (closed-loop systems) to support future growth.

SPP6 – Housing Supply and Diversity (ref. page 71)

General comment: The CRC for Water Sensitive Cities authored-report, *Planning for water sensitive infill development: case study Salisbury East precinct*.

Issues for consideration: A study of the City of Salisbury demonstrates how a range of infill typologies, coupled with precinct and streetscape WSUD can achieve density AND environmental outcomes to support housing diversity goals.

Recommendation

1. Include City of Salisbury in the defined locations where regeneration and strategic opportunities can be identified.

A greater choice of housing in the right places

Priorities and direction

SPP6 – Housing Supply and Diversity (ref. page 79)

General comment: Quality research is readily available that demonstrates increased housing diversity can achieve greater onsite private open space and stormwater management.

Issues to consider*:* Refer to *CRC for Water Sensitive Cities Infill typologies catalogue* for a suite of infill designs at a range of scales that facilitate greater provision of private green space and improved stormwater management.

The urban form to bring our vision to life

Strategies and tools that could encourage Living Locally (ref. page 91)

Recommendation:

1. Recognise the contribution waterways and drainage lines (specifically open channels) can make to expanding the network of open spaces.

Infrastructure and services

Trunk and non-trunk infrastructure (ref. page 94)

Given the substantial cost of trunk infrastructure, areas identified for short to medium term growth will look to maximise existing infrastructure. This can be more cost effective and less disruptive to the community than building new infrastructure.

General comment: This may be true to some extent, however it results in intergenerational cost shifting and transferring risk between stormwater catchments where asset infrastructure is not capable of responding effectively in changed climatic conditions.

Many existing stormwater drainage systems within infill suburbs no longer perform at their design function, e.g. typically the underground (minor) drainage system should contain the 1 in 5-year average recurrence interval (ARI) (18.1% annual excessive probability – AEP) design storm, without reaching capacity when floodwater spills over roadways. Systems such as the Fredrick Street catchment within the Cities of Marion and Holdfast Bay will experience inundations of the road network more frequently (1 in 2-year ARI or 50% AEP). This means in any given year the design storm has a 50% chance of inundating the road network, exacerbating traffic and safety issues.

A WSUD design approach at the allotment scale (rainwater harvesting and plumbed for indoor use, infiltration systems and permeable surfaces) and local neighbourhood street-scale WSUD can extend the life of existing drainage networks considerably by attenuating or reducing discharge to drainage networks. The Planning and Design Code must facilitate a multi-beneficial approach to maximise investment in trunk infrastructure.

Part 2. Where should Greater Adelaide grow?

The Commission's Principles for Identifying Land for Housing and Jobs

The 7 principles (ref. page 101)

5. The encroachment of urban areas on places of high primary production, landscape or environmental significance should be avoided.

General comment: Preservation of waterways AND drainage lines is critical. Local government now understands that former practices of burying natural drainage lines and creeks is inadequate stormwater management and this outdated approach has failed to manage water resources sustainably. The Pasadena Biodiversity Recreation Trail at the City of Mitcham is an example of how councils are now reimagining established suburbs by bringing stormwater to the surface, effectively "daylighting" a creek that was formerly buried. This project has provided greater connection to nature for the community and significantly enhanced the amenity and biodiversity of the area by converting one of three 900mm stormwater pipes into a natural system via a series of vegetated basins and swales to reintegrate the water back into local soils via infiltration trenches to support tree health, building resilience in the urban landscape.

The City of Adelaide is also working to rehabilitate Botanic Creek in the eastern Park Lands, recognising the benefit of quality watercourses in open spaces.

Greenfield and satellite city growth (ref. page 111 & 112)

General comment: It is agreed that master planned communities represent the best opportunity to incorporate waterways/stormwater management and green infrastructure into new communities.

Issues to consider: It is critical for planning documents to outline the requirements for WSUD as part of new communities, to include mandatory measurable performance targets for incorporation of stormwater treatment, flood protection, green infrastructure and water reuse systems. This should be emphasised in the text as a requirement of future urban planning.

Eastern spine

Why this area (ref. page 123)

This area was identified as an investigation area for future residential/employment activities because

- *The typography of the land does not present significant challenges*

General comment: While this may be true for Murray Bridge, the Mount Barker topography is substantially more challenging, with defined drainage lines and watercourses with steep grades that must be protected from urbanisation. Greater emphasis should be placed on integrated WSUD design approaches incorporating treatment, biodiversity and recreation as part of master planning to mitigate degradation of local water courses (rather than basic detention alone). Failure to include WSUD assets will place substantial burden on the high environmental values of these areas, leading to degraded streams.

Further, construction phase sediment management is a major challenge in the Mount Barker area due to the slope of the land coupled with the high rainfall area. Industry and local government need greater support from state government in the management of this significant risk to the environment.

In a related policy matter, Council development plan sediment control policies were removed from planning policy in the conversion to the Planning and Design Code and need to be reinstated with current best practice sediment management policy as a matter of priority.

The Greater Adelaide Regional Plan Discussion Paper

General comment: Water Sensitive SA is supportive of a Regional Plan for Greater Adelaide that recognises the substantial role water plays in maintaining and enhancing a thriving and sustainable city.

DTI:PlanSA Submissions

From: Marty Cielens <[redacted]>
Sent: Thursday, 2 November 2023 4:20 PM
To: DTI:PlanSA Submissions
Subject: Western Adelaide Coastal Residents' Association submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: WACRA Submission on the Greater Adelaide Regional Plan - 4 Nov 2023.pdf

You don't often get email from [redacted]. Learn why this is important

I am please to submit a response to the Greater Adelaide Regional Plan discussion paper on behalf of the Western Adelaide Coastal residents' Association

Marty Cielens

Chair
Western Adelaide Coastal Residents' Association
[redacted]

A WESTERN ROADMAP

WACRA submission on the Greater Adelaide Regional Plan Discussion Paper

4 November 2023

New Operating System Upgrade - GARP

We are heartened to read that the Greater Adelaide Regional Plan (GARP) will replace the current 30-Year Plan for Greater Adelaide. This plan has not aged well, causing harm and heartache. It is very timely to refocus strategically on what can be learned from the experiment and use those findings to inform this new plan.

WACRA endorses the outcomes as proposed in the GARP. In the past, growth was seen as the panacea that would overcome all problems. We now realise that untrammelled growth also leads to undesirable outcomes for our community.

The goals of our residents' association are very similar to these four outcomes built into this Greater Adelaide Regional Plan. The key will be how to implement these and keep them in balance as the pressures of population growth, climate change, technological change and other unknown factors stress the plan.

The Dynamic Adelaide West Region

The west is going to benefit from the massive infrastructure spend on the north-south corridor revamp of South Road which will bring increased growth and industry to our doorstep.

The other huge spend is the Federal Government's defence policy, concentrated on the AUKUS nuclear submarines and upgrades of other naval and air defences which will, if it goes ahead, will boost employment from trade workers to scientists and project managers. As with the previous Collins submarines, opportunities in the nearby west benefit sub-contractors in all areas of defence procurement.

There is still great uncertainty about this project, financially, politically and strategically. Given the attention our current state government is making on creating a green hydrogen plant. What about skipping the submarines and creating industries for the future – e-vehicles, e-buses, e-trains, white goods and solar panels? We have the land and industrial scope. Our current Premier could be the champion of a multi-armed green industry economy, just as Premier Thomas Playford championed manufacturing industries that provided the state economic growth.

The west is growing at 10 per cent per annum, attracting the lion's share of new migrants who come to Adelaide. This new energy, new drive and ambition will be crucial to a thriving region in the west. We lack a university campus to underpin the crucial skills development programs for the future. Would the GARP framework encourage allocation of assets, such as university campuses across the geographical spread of Adelaide to encourage educational mobility?

Unintended Consequences of Narrow Project-based Planning

The success of the new GARP will be a widening of planning perspectives to achieve its four interlinked outcomes. Every project should be tested against these four outcomes to ensure that progress in one place does not create problems elsewhere. We have a recent local case study in Henley Beach that illustrates how easily this can happen with a narrow project-based perspective.

Main Street Redevelopment created a new pedestrian and entertainment precinct in what was an underused road opposite Henley Square. As part of improving Main Street, the project undertook major traffic calming of the cross street, Military Road which now has new roundabouts with wide pedestrian crossings, raised calming devices, new pedestrian paths and landscaping.

In terms of urban beautification, it is a success, with traffic calming prioritising pedestrians, access and safety over the previous use of Military Road as a north-south feeder road between Henley Beach and Grange Roads.

The unintended consequence, however, is that traffic that previously used Military Road now diverts to Seaview Road, a normal suburban width street. This now takes all of the vehicles that previously used Military Road. Pedestrians using the wide, safe crossovers to get over Military Road are marooned trying to cross Seaview Road on the way to the beach. On warm weekend days, the road is bumper to bumper with traffic from Grange and Henley Beach Roads heading to the Square and there have been several accidents on the street, a recent one fatal.

In the GARP planning framework, would this be seen as a successful outcome? It is a small example of how any development needs to model consequences across a range of linked systems. No change is simple in today's world. With the help of AI tools and a strong visionary master-planning, disruptions from change can be predicted and resolved at the planning stage.

Big Ideas Needed for an Uncertain Future

From a local issue to a big-picture idea. Recent announcements about moving 800 ADF personnel from the Edinburgh airstrip opens the door for a second, perhaps major airport in Adelaide. The sea level rise maps show Adelaide Airport could be flooded by the end of the century. Because of air strikes with birds, the airport management are loathe to plant trees. If Edinburgh became Adelaide's main airport, imagine the current airport land converted to urban forest, a new Reedbeds, as development of all kinds moves north. Does the GARP leave space for big picture ideas like this?

Can we sustain the present level of growth knowing the impact of climate change coming? How can this plan help encourage people to design and build houses that live more gently on the earth? Swimming pools will be a luxury full of precious water. Large homes with no gardens will be hot boxes.

Present plans are very focused on development for economic and capital growth without placing priorities on how all living things will live sustainably, given the extreme changes coming. More resources in education of our citizens will be needed to help make a smoother transition to our new world in our natural and built environments. [1]

[1] Priorities for a Strong Community - City of Charles Sturt Community Plan 2023 http://wacra.org.au/new/wp-content/uploads/2023/10/WACRA-Community-Plan-submission-2_9_23.pdf

GARP OUTCOME: A greener, wilder and climate resilient environment

SPP1 – INTEGRATED PLANNING

We support a planning system that can enable a more walkable urban form, better access to public transport and support for low emission transport technology. Adelaide residents have shown themselves to be resistant to all such initiatives in the past, preferring their private fossil fuelled cars. This plan will promote positive changes.

Support Strategic Infill
WACRA endorses identifying major corridors for strategic infill, rather than the urban infill model in the existing 30-Year Plan code which has caused many problems. There have been examples of successful strategic infill in Bowden-Brompton, Dock One and Port Approach (South), North West and Fletcher's Slip and West in West Lakes. There are several medium size strategic western infill sites in planning such the Rowells Road wholesale grocery site in Underdale and the SA Water waste treatment plant in West Lakes.

Transit-oriented developments in large clusters could be planned all along the Grange/Outer Harbour train lines in addition to the above key building projects that will establish new supplies of homes while promoting sustainable urban growth.

Identifying these strategic infill sites is key, as is how to manage the growing population's, transport needs in a city that was not designed to carry this growing load on its roads.

Imaginative Public Transport Initiatives
We are fortunate in the west to have the City to Glenelg tramline, the Outer Harbour and Grange train lines and extensive public bus services which now run on 15-minute schedules during the day on major feeder roads to the city. DDA upgrades of bus stops continue, making this an affordable and equitable means of transport for everyone.

The buses are, however, under-used. Sydney is exploring using new technology to alert intersection lights ahead when a bus is coming and automatically prioritise the bus, making for a faster commute. The potential to use this technology exists in our traffic light network. It just needs to be implemented. Ideally, western train infrastructure needs to be electrified, but given ballooning construction costs of new rail, rapid bus routes are a medium-term option.

Revise Code Amendments for Private Vehicle Parking
Even if the future will be electric vehicles, Australians have a definite preference for larger, fossil fuelled cars. Current codes for parking bays need to be revised to accommodate the significant increase in these longer and wider vehicles.

Given the Australian Bureau of Statistics' documented increase in 2-3 car households, the 30-Year Plan definitely needs to bite the bullet and call for two cars to be accommodated in new dwellings, to stop the crowding of narrow streets that has grown considerably since the current plan was adopted with its minimal requirements for car parking on private property.

Current driving times to and from the city on weekdays are getting to be almost equivalent to cycling times, with bumper-to-bumper traffic moving slowly through the crowded roads. This points to a need for a carpool/bus lane and single-occupant lane on two-lane feeder roads.

Government has the power to make change. The bus lanes in Currie/Grenfell Street faced a huge outcry. They have proved to be a very useful tool to move people much more efficiently through the city on public transport and have not greatly inconvenienced drivers.

We recommend more use of this type of leadership for feeder roads into Adelaide with the left lane reserved for buses/carpool (2 or more people) and the normal commuter traffic with a single driver occupant in the right-hand lane.

This would need to be enforced with cameras at intersections and other patrolling, but once adopted and accepted as best practice, could greatly increase people sharing car-rides into the city and using low-emission public transport.

Adopt Separated Cycleways

Greater innovation in cycling paths separated from traffic could see a greater adoption of this vital transport mode. At the moment, there are too many accidents and fatalities from unsympathetic motorists, accidental door opening and speed. We see a completely separated path as the only way to improve safety and widespread cycling adoption.

Innovative Thinking with New Transport Technologies

All options need to be considered, including light rail and innovations such as on-demand, microbility and block chain and distributed ledger technologies. The alternative is roads choked with private vehicles that are becoming bigger and more polluting.

SPP4 – BIODIVERSITY

WACRA fully supports increased biodiversity initiatives and targets. We call on this plan to look at blue carbon and green engineering as priorities for our climate-stressed future.

Dune Restoration

As a group that advocates for coastal residents, we also agree with the Discussion Paper's assessment that increasing sea levels, both day to day and in extreme events, is a near-term threat. We have been vocal and continue to be advocates for improved coast management and dune restoration. [2]

[2] Submission to the Independent Panel - Adelaide Beach Management Review, October 2023. http://wacra.org.au/new/wp-content/uploads/2023/10/WACRA-submission-to-ABMR-IAP-151023.pdf

WACRA believes that thinking in terms of green engineering, such as restoring dunes using fencing to capture sand and holding sand down with plants is an effective coastal complementary approach on the metropolitan coast that could add protective natural buffers against increased tides and storms and provide much needed habitat along the Coast Park Path.

Seagrass Meadows Benefit Coasts and Climate

Seagrass meadows are vital to marine environments but little understood because they are underwater. A huge effort is needed to restore the 6,000 hectares of Adelaide's seagrass meadows lost due to the Glenelg sewage works and nutrient-rich stormwater run-offs. Local researchers know how to do this with sandbag drops in winter. These start new meadows which will establish within 8-10 years, add friction to seabed waves and work to slow destructive waves eroding the coast. They also are extremely effective carbon sinks once established.

The knowledge of how to rebuild these meadows for Adelaide conditions is there, but where is the government commitment to invest in protecting the coast through seagrass restoration? It is currently a small scientific endeavour aided by Seagrass for Snapper volunteers.

River Torrens/Karrawirra Parri Restoration

With the recent completion of the Breakout Creek/Purruna Parri wetlands at the end of Karrawirra Parri (River Torrens), there is an accessible public shared path from the east, through the city, to the river's outlet with established trees and new grass and shrub areas. The goal of the partners in this project is to have a river clean enough that native fish can thrive and key species such as rakali (native water rat) and platypus can enjoy the river again. It will significantly add to the ecological health of that region.

Given that Adelaide's west used to be the Reedbeds seasonal wetland until the drainage for the Adelaide Airport and housing, we welcome this new environmental feature with its planting that may see the return of some of the 50 or so bird species which have not been sighted there for more than 70 years because of environmental destruction. The early indications are that biodiversity will flourish due to this initiative.

Extend the Karrawirra Parri Greenbelt into Nearby West Beach and Airport Land

There are other areas of the old Reedbeds estate between the Patawalonga and the Port River estuary that could benefit from mass replanting and establishment of biodiversity corridors.

The GARP could build on the river's new environment and push these environmental benefits out to neighbouring unplanted land, including at West Beach and at the Airport, as a rich urban forest biodiversity mecca.

Biodiversity is the key to a healthy environment. This means we should look beyond just trees. They are a vital but only one link in a web that includes many other fauna-friendly ecosystems.

SPP5 – CLIMATE CHANGE

WACRA supports all the initiatives proposed, particularly mapping the tree canopy. It is our hope that if the suburban infill that now is decimating trees is replaced by strategic infill coupled with tree planting along corridors, this will make some difference to attaining already difficult targets. Here is a link to our submission to SA Parliamentary Inquiry into Urban Forests.

Urban Forest Essential for Health and Wellbeing
WACRA has consistently called for greater resource allocation, planning and implementation of an Urban Forest strategy for Adelaide. [3]

Green will be our friend as we come to a drastically changing climate. Many problems with establishing an Adelaide urban forest stem from the existing Planning and Design Code. Tree canopy has gone backwards since it came into being.

We need to tighten the current Planning and Design Code's lax tree removal provision and consider much stronger mandates, such as Brisbane's requirement for 15 per cent of each property to have Deep Soil planting. And perhaps, considering recent developments in Sydney, it is time to reconsider the proportion of open space in Adelaide's west occupied by golf courses. Who owns these social licenses for these spaces? Imagine just third of them devoted to new forested public parks.

Deaths from heat are disproportionately high among people who work outside, the elderly, people with pre-existing conditions, those who are socially isolated and people who don't have access to a cool space for relief. Excess deaths in population studies are now generally ascribed to heat and smoke issues. Many who can least afford an air conditioner also live in areas with poor tree cover or access to transport.[4] This highlights the crucial role tree canopy plays in mitigating the health impacts of climate change.

Grasses As Well As Trees
We also would like more emphasis on green beyond trees, including converting public lawned space to native grasses capable of supporting diverse populations of birds, reptiles and insects instead of the sterile mowed lawn. Use of artificial turf should be banned in South Australia for its toxic, fossil-fuel based emissions in manufacturing, installation and on disposal. Artificial turf also contributes to the urban heat island effects.

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[3] Submission to the SA Parliamentary Inquiry into Metropolitan Adelaide's Urban Forest 2023 http://wacra.org.au/new/wp-content/uploads/2023/06/WACRA-Submission-Urban-Forest-Inquiry-130223.pdf

[4] 'Silent killer': more than half of heatwave deaths are in disadvantaged areas – now Australian councils are fighting back, https://www.theguardian.com/news/datablog/2023/oct/29/silent-killer-more-than-half-of-heatwave-deaths-are-in-disadvantaged-areas-now-australian-councils-are-fighting-back?CMP=Share_iOSApp_Other

SPP12 -ENERGY

Any progress in sustainable infrastructure that reduces emissions and harvests solar energy to meet net zero targets is welcomed. We agree that areas of high scenic and environmental value should be protected from such infrastructure developments with planning at land division stages.

Community Batteries
We welcome the attention on SA's renewable energy action and agree that we could do much more. In terms of the outcome of a more equitable and socially cohesive metropolitan Adelaide, WACRA is supportive of much more work to install community batteries capable of tapping in to excess rooftop solar generated in sun-drenched South Australia.

So much of this energy could be used to lower prices, providing relief for renters and low-income people who cannot afford the capital cost of solar panels for their homes. WACRA has advocated for community batteries with our local council and hopes that their enthusiasm for this initiative will lead to action.

SPP 13 – COASTAL ENVIRONMENT

What could be of more environmental significance than Adelaide's coast? The beauty and attraction of the coast is a magnet to be protected through sound management of environment and infrastructure.

Plan for Coastal Roads
The GARP Plan proposes strategic infill along both Henley Beach and Grange Roads, but does not address how to handle traffic that is bound to increase along the coastal roads such as Seaview Road and the Esplanade with the increased population using Henley Beach and Grange Roads to get to the beach. Our east-west road system was never designed for the level of urban infill that has been happening even before the proposed growth occurs. This is definitely one area where innovative public transport options are needed along with other strategic planning.

Growth of defence industries on the Lefevre Peninsula will result in increased north-south traffic by workers living to the south using Military and Seaview roads. WACRA proposes that major planning for the roads running parallel with the completed Coast Path be undertaken.

The closest north-south roads of any carrying capacity near the coast are Tapleys Hill Road/ Brighton Road and Military Road north of Grange. These roads could form the spine of a new strategy, especially if made into attractive corridors of trees and safe bikeways.

Blue-Line West e-Bus Service
Eight years ago, WACRA submitted a plan to the City of Charles Sturt to trial a Blue Line West e-bus service connecting the Glenelg tram to the Grange Train. The service would run along Military Road and stop at busy destinations such as the West Beach Adelaide Shores caravan

and holiday complex, the West Beach shops and Surf Life Saving Club, Breakout Creek/ Purruna Pari wetlands, Henley Square, Grange Jetty and beach and Grange Railway station.

If the State extended the rail line to Semaphore, then such a service could include Point Malcolm and Semaphore. Such a regular service would reduce road traffic, need for more parking spaces, and provide safer and more enjoyable modes of transport along the coast in conjunction with the completed Coast Park Path.

Beach Management Through Dredging and Green Engineering

As part of WACRA's submissions to the Beach Management Review currently underway, we have supported the option of dredging to supply sand to the West Beach area, not a pipeline and not trucking.[5]

We believe that, on the basis of information provided so far, dredging as Adelaide's primary beach management tool could mitigate climate risks, combined with complementary methods of growing dunes, planting dunes and growing seagrass meadows.

SPP 14 – WATER SECURITY AND QUALITY

WACRA support all efforts made by many stakeholders, including local governments to climate-proof Adelaide's water. Adelaide has the advantage of a cooperative culture working to develop a Resilient Water Future Strategy and an active desalination plant to supplement other shortfalls.

SA is known as the 'the driest state in the driest continent', so water has always been a prominent issue. Strategies have included local governments investing in recharging our underground aquifers, using sewage water for agriculture and recycling water for metropolitan public parks and gardens.

Water security will always be a pressing issue, as we found out in the 2001-2009 Millenium drought. Since then, 11 metropolitan wetlands have been developed. The desalination plant was built in 2012 to provide some security from future climate change conditions. That plant was built to desalinate 100 gigalitres per year and presently is running a reduced maintenance load which is used to top up Adelaide reservoirs and keep its maintenance contract.

SA Water operates 11 desalination plants across the State, two using sea water at Lonsdale and Penneshaw and the other nine treating saline groundwater in remote communities. This engineering strategy takes pressure from groundwater, surface water and River Murray supplies.

[5] Submission to the Independent Panel - Adelaide Beach Management Review, October 2023. http://wacra.org.au/new/wp-content/uploads/2023/10/WACRA-submission-to-ABMR-IAP-151023.pdf

The Murray River agreements have not been fulfilled through the Murray Darling Basin Plan and will need to involve strong Federal legislative requirements of the eastern states to protect Greater Adelaide water supplies. Future planning of regions MUST have guaranteed water supplies.

SPP15 – NATURAL HAZARDS

WACRA members have direct experience of coast erosion over decades and hold serious concerns that the latest Review will be able to find an adaptive solution to continuing coastal erosion. We have been active in advocating that Government to use science and best evidence to create a way forward for this vital problem.

Whatever solution is chosen, science about its success or otherwise will be valuable commercial IP for the State to export as long as this is built into its operating budget.

GARP Outcome – A more equitable and socially cohesive place

Where to with Reconciliation?
Following the defeat of the Referendum on the Voice and Constitutional recognition, it is more important than ever for SA to establish its own voice to Parliament to bring different voices of First Nations people in SA to the table. No one disputes that the legacy of missions, Stolen Generations, juvenile justice systems and mistrust at all forms of 'white' assistance, has left many Aboriginal and Torres Strait Islanders in very disadvantaged life situations.

Combine this with the insidious effects of intergenerational trauma and early mortality. including youth suicide, this community requires as much support as the Government can give to empower Aboriginal leaders, established and up-and-coming. They will be leaders who can forge a path forward.

The UN Declaration of the Rights of Indigenous Peoples can form a framework for evaluation of progress, now that there is not a Constitutionally enshrined voice. In 2009, Australia ratified this Declaration and ten years later, in 2019, the national government began steps to develop a National Action Plan to implement under its protocols. SA needs to have input into this plan and to use its benchmarks to evaluate its progress for our Aboriginal citizens over time.

Mixing Up Housing Stock to Shake Up Social Inequality
Adelaide, like every Australian large city, has its share of 'desirable' and 'less desirable' suburbs. In Melbourne, we see the same trend as here with the inner east seen as more desirable than the inner west: Beaumont and Burnside vs Rosewater and Royal Park.

The Atlantic reported recently on statistical research by Professor Raj Chetty of de-identified US tax records that shows the powerful effect of suburbs on children and their earnings as adults. Certain cities and suburbs were better places to raise a child, with the best cities increasing a child's future income by about 12 per cent. Prof. Chetty says that of all the decisions a parent makes in a child's life, the location of where to live is the most pivotal.

Adelaide Needs a Wider Mix of Housing and Locations
The implication of this study is a call for the GARP to seriously examine how to mix up housing forms and affordability so that people are not stratified necessarily by suburb housing price. We have such a limited range of housing types – the one family home and backyard, the walk-up two-bedroom flats and now, the duplex townhouses dotting most suburbs courtesy of our existing Planning Code.

Where do we have the large family-size apartments? Where are the affordable rental homes? The mistakes of the past, where whole suburbs were built by the SA Housing Trust in good faith, cemented the legacy of these suburbs as a less equitable alternative. Somehow, incentives are needed to shake up the type of housing everywhere so that more choice is introduced into the housing stock. Metropolitan Adelaide could begin to look more socially cohesive across the range of regions within it in a win-win for a vibrant, equitable community.

Avoiding Disadvantage Associated With Low Income Suburbs

Denmark recently announced it will demolish public housing neighbourhoods with 'parallel societies' of segregated enclaves of migrants who do not participate in the wider community. With bipartisan political support, the Danes are mandating that no neighbourhoods will have more than 40 per cent social housing by 2030. They use criteria of low income, low education, high unemployment or a high percentage of residents who have criminal convictions to decide which public housing will be emptied or torn down. They will offer these properties to the open market to revitalise the areas.

We do not have the Fitzroy 1960s towers that Melbourne has, but we do have many suburbs in the west that are the legacy of 'warehousing' new Australians in low-standard housing. While not as extreme as Denmark, Adelaide must make a commitment to integration of new arrivals in housing that does not discriminate, stigmatise and lower their life chances from the start. Spreading new arrivals evenly throughout the community revitalises all suburbs and gives new life to settled areas.

Opportunities for disadvantaged people to move to affordable or social housing in more advantaged suburbs can have a key outcome in terms of student learning. With SA towards the bottom of Australia's NAPLAN results, only higher than the Northern Territory, a more radical restructuring of opportunity via housing mobility may be a key to accelerating those results, along with other initiatives in literacy and numeracy being undertaken in the schools.

Bring the Arts into Planning

Story-telling, First Nations marking, social inclusion, beautification of suburbs and place-making are essential elements when planning to achieve the four GARP outcomes. These arts and cultural elements could bring new people around the table in planning teams, a mixture of gender, skills and experience, contrasted with the mostly male professional project-teams. The results of more wholistic planning would reflect a multiplicity of stories, perspectives, a richer view of planning to include women, children, older people and others with disability.

Currently, the space for indoor and outdoor arts and community entertainment are given low priority compared to commercial interests when new developments are planned. Consideration of repurposing heritage buildings to keep their fabric and use for community purposes builds a sense of connection to the past and acts as a bridge in our fast-changing world.

The Woodville Town Hall, for example, is now a multi-purpose entertainment, cultural, and gathering place in our community with programming facilitated and promoted at the local government level on behalf of the community. The new cities on the outer ring will need equivalent gathering places, not just houses and shopping centres, so that people will be able to engage as a community in arts and social events, ameliorating the loneliness epidemic and building new healthy relationships.

Rebuild Adelaide's Network of Comprehensive Community Health Centres

To achieve the GARP outcome of 'a more equitable and socially cohesive place,' a comprehensive model will include the interaction of physical, cultural, emotional, economic and social health in communities and individuals. The comprehensive community health centre model is noted for its capacity to build social cohesion, reducing social disadvantage, and building a fairer more compassionate society. Multi-disciplinary teamwork is vital and needs to be well co-ordinated.

Programs and services reach across the community health continuum – including disease prevention and health promotion, assessment and management of health problems, early intervention, support, treatment and rehabilitation.

Community engagement is vital and drives identification and assessment of health issues, informs advocacy and community development, enables group programs to build individual and social capacity, sensitises and links to individual treatment services, and influences the management of the organisation to ensure programs are relevant and locally responsive.

When planning for new satellite communities outside metropolitan Adelaide, acute and primary health care are also essential elements to service healthy communities.

SPP1 – INTEGRATED PLANNING

Social and Physical Infrastructure For Liveable/Walkable Neighbourhoods

It is no longer acceptable to simply outsource a new development to a developer and hope that it will contain all the social infrastructure needed to build a community. Setting criteria for liveable/walkable neighbourhoods would definitely up the ante for developments to have less car dependency and to make it more pleasant to move around on foot, bikes and scooters. Roads, schools, water, green infrastructure and healthcare are key components of quality of life, no matter how far from the city new housing may be.

WACRA endorses the policy of transparency about costs for different forms of housing supply, including the upfront purchase price plus information on ongoing living costs, particularly as GARP's proposed new zoning will permit housing further from the CBD than ever and transport costs rise with distance.

Developments of public spaces often suffer from sins of omission rather than of commission, often built on a cut-and-paste template. New home buyers do not usually ask for clean air, walkability, arts or community facilities. As a result, the health and well-being costs are borne in a different sector and often at a different time than when young buyers purchase their 'dream home'.

We need a planning model that places the onus for improvement in quality of life including clean air, walkable streets squarely with those who most profit from new developments, the developers. Disclosing the costs of living in their new homes over time is another suggestion that we support.

SPP2 – DESIGN QUALITY

Increased Access to Nearby Green Spaces
Adelaide has traditionally had fewer pocket parks than, for example, in Sydney where a dense population can walk to a nearby park for recreation and play. Because Adelaide has had space, we have spaced out playgrounds and parks. WACRA believes everyone should have access to high quality, well vegetated open spaces in easy walking distance. This should be a requirement in all greenfield and strategic infill developments.

Market the Value of Trees
There are pockets of resistance in some lower socio-economic areas to the idea of 'trees'. Trees for some have come to have a menacing rather than comforting meaning. Along with urban greening policies being applied equitably across all forms of housing supply, we urge the Government to roll out an education campaign about the value of trees.

Major new recommendations for multi-storey developments along city feeder roads need to be coupled with planning for avenues of trees, such as Paris, Barcelona and other cities are doing. These soften the height profile eventually and provide identity, biodiversity and heat island amelioration.

Liveability in Character Zones
WACRA is keen for the Review to follow up on identifying areas for additional heritage and character protections. Given that the west is largely 'settled' in waves of time, there will be many character areas that could benefit from this added layer of scrutiny and protection. The past decade has seen a lot of heritage knocked over, with little regard for this important story of the cultural settlement in Adelaide in various waves.

Those already living in character and heritage zones will wish to retain what attracted them initially and not lose their heritage value with modern 'big boxes' changing their neighbourhoods' built form and charm.

Design for Intergenerational Housing
The rise of the service economy, where many new migrants get work in areas such as disability and aged care in particular, coincides with new residents who want to and do live in a multi-generational family structure. Adelaide has previously not given much thought to creative application of design to this challenge. Many of these new SA residents have come from more advantaged backgrounds than previous waves of migrants and will have the means and incentive to rent and buy housing for their extended family.

The pandemic has also shown that many families moved closer to each other to provide support. Traditional Australian housing forms close off options for grandparents to live on the property but separately. Overseas, granny flats have become staples of boosting numbers of people on a block and able to operate as a family with independence. WACRA supports review of zoning that opens more options for extended family living across generations.

GARP OUTCOME: A strong economy built on a smarter, cleaner, regenerative future

SPP1 – INTEGRATED PLANNING FOR EMPLOYMENT LAND ALLOCATION

WACRA approves of the proposed employment land allocation in the north-west, including Gillman, Wingfield and Lefevre Peninsula. In previous decades, residents in these and nearby suburbs have suffered respiratory illnesses from emissions of heavy industry and mineral processing.

Strict environmental and noise criteria need to be developed and enforced when industry is located close to residential housing. If this is maintained, it may be possible to extend the types of housing and density, to make this land more desirable than it currently is. The trend towards cleaner and quieter industries may coincide with new residential opportunities that work as employment magnets.

SPP5 – CLIMATE CHANGE

Potential for a Western Green Industry Hub

The west of Adelaide is perfectly located to take advantage of green technologies, carbon storage, cleaner industries and the regenerative economy. Local governments in the west are all working towards these outcomes, no matter what happens with the AUKUS project. There is a need for a university campus in the west to act as a magnet and hub for developments, such as Tonsley/Flinders south of the city and UNI SA's Mawson Lakes in the north.

The Outer Harbour train-line, the north-south corridor and a growing skilled workforce make this an attractive destination for state planners to work with local partners to establish a new Green Industry Hub in the west.

Zero Waste and Recycling Facilities

Work between partner councils, Port Adelaide Enfield and the City of Charles Sturt has pioneered a shared waste management and recycling facility. More economies of scale as future recycling goals are introduced make sense rather than piecemeal small installations. We would like to see the GARP introduce stronger incentives to accelerate this trend for the circular economy.

GARP OUTCOME: A greater choice of housing in the right places

SPP1 – INTEGRATED PLANNING

Support Diversity in Housing Options
WACRA supports the priorities and directions that maximise housing choice and different forms of housing. This includes integrated, not clustered, social, affordable and accessible options. We have been poorly served by the choices on offer. Infill sites that are project managed strategically can and should provide this diversity.

In the west, we believe that as well as targeting Henley Beach and Grange Roads and all potential sites along the Outer Harbour and Grange lines should be considered for higher, denser apartment living at accessible transport locations with the proviso that the existing north-south roads are also master-planned for safety and amenity.

SPP2 – DESIGN QUALITY

Support Wide Implementation of Liveable Housing Criteria
South Australia has now signed up to the silver level of liveable housing in all new homes. This overdue initiative means that people will be able to access a level entrance, wider entry door, reinforced wall for grab-rails in the bathroom and a hob-less shower, should that be needed. The consequent amenity in new built homes will show its worth as people transition through life cycles, meaning they do not have to move if they have a serious illness or accident, or just want to age in place.

WACRA urges the Government to integrate information about liveable housing requirements in SA throughout the building industry as a widespread reform that will begin to future-proof new houses for demographic trends of ageing.

These homes are not designed for people with severe physical disabilities and the stock of the accessible homes needed by these people to rent or buy has always been in high demand. The challenge to establish them is starting to be met by social entrepreneurial organisations and some super funds, but more needs to be done in planning regulation to incentive providing housing that will give physically disabled South Australians more choice.

Strengthen Thermal Efficiency Standards for All Homes
We also would like the Government to adopt more ambitious climate protective requirements with thermal efficiency criteria for new houses, as it is clear that more heat, more rain, more flooding and fire are the future of our State. We pride ourselves on being enlightened, yet unless these types of criteria are mandated, builders can always rely on the ‘price’ argument to defer these treatments for another time. It is then that both new home buyers and renters least able to withstand bill shocks are slugged for the lack of thermal efficiency in their homes.

There is a divide between people who are living in well-insulated double-glazed houses, and people who aren't. People who aren't are going to have increased power bills. Many people with co-morbidities don't have a cool place in their homes which increases the risk of death from heat stress.

Now is the time to be future-proofing our homes. Insurers will look with favour on homes that have these characteristics, compared with basic fit-out. Energy costs for residents will be lower and amenity better in extreme temperatures. Landlords can benefit from securing good long-term tenants who value these amenities and home owners can also reap benefits with renters in lower utility bills

THE URBAN FORM TO BRING OUR VISION TO LIFE

Liveable Communities do not just 'Happen'

WACRA was not surprised that the testimonial in the Discussion Paper is from a western resident, Bowden woman, Renee Slugjski. There are many areas in our west which already demonstrate the living locally elements proposed by the Paper.

Local governments, networks of community association, residents' groups, tireless champions of areas have all added their energy to create such liveable communities. The pay-off is that where walkable local living communities exist, property values for existing residents rise.

The challenge to this plan is how to engender this change with community partnership and local government support, as it is this area of government which works most closely with local networks to either frustrate or move towards the four GARP outcomes.

State agencies, working with the Local Government Association and developers could form creative partnerships that enable the idea of liveable community to form the nucleus of any newly created developments.

INFRASTRUCTURE AND SERVICES

WACRA will not comment on the greenfield growth areas as they are not in our western area. However, as climate change and net zero futures become more of a reality, the established and ageing infrastructure of metropolitan Adelaide will need conversion. Timing this renewal and maintenance to happen sequentially, before it becomes less useful, is an important part of a considered plan such as GARP.

We have the benefit of a well-planned community in West Lakes with Delfin (now Lend Lease) as its property developer. Opened in 1977, the infrastructure and services within it have functioned well, and with the move of the Adelaide Crows out of Football Park, we have seen what adaptive reuse can do to kickstart a new round of neighbourhood development with West.

URBAN INFILL GROWTH

Regenerated Neighbourhoods

In the western suburbs, we are watching many old Housing Trust neighbourhoods being progressively modernised where there was a predominance of them. It is not clear that there is a wider range of housing types being built but there appear to be more apartments than the traditional small stand-alone house.

Focus on Established Urban Activity Centres

Of the urban activity centres based around shopping centres in the west, we are already seeing massive development around West Lakes in housing, the new Ngutungka library/ community hub and other service industries. We agree that Arndale, with its large mix of multicultural residents, closeness to the CBD, shopping, health and other services would be a prime area for further higher-density housing to boost its economic viability and celebrate its community vibrancy.

Better Planning for General Infill

WACRA wholeheartedly concurs with the GARP analysis that 'the Commission recognises the need to manage small-scale infill with greater care to address community concerns about poor design, tree canopy loss, street parking, and detrimental effects on area heritage and character.' We addressed these and more in our submission to the Review of the Planning and Design Code and await their findings with interest.[6]

EMPLOYMENT LANDS

Climate Risks to the Future Scenarios

The section of the Discussion Paper canvasing trends in employment lands fails to mention potential climate risks escalating rapidly over the 30-year timeframe of this plan. This seems a major omission.

Maps of projected sea level rise show how it will affect Adelaide beaches and the Port River area. The higher water levels will result in flooding throughout much of the low lying west, an area that used to be the Reedbeds.

Adelaide has not seen the ravages of floods that eastern Australia has endured, but that does not mean that, even with the best planning, these events will not begin to occur. Each

[6] Planning, Development and Infrastructure Act 2016 - Western Adelaide Coastal Residents' Association Submission, December 2022 http://wacra.org.au/new/wp-content/uploads/2023/07/WACRA-submission-on-SAs-Planning-Act-and-Code-Dec-2022.pdf

degree of global warming brings a 7 per cent increase in humidity in the air, which means rain and storms accelerate in their destructive power.

In the northeast, east and south, areas with high eucalypt coverage, the threat of mega fires will rise and have serious consequences.

Agriculture, both in Australia and globally, will be impacted by droughts and floods to unprecedented levels. Consequently, we will not be able to assume that world food trade will operate as normal and provide us with what we need to maintain our lifestyle. This is another reason to ensure we maintain a diverse and sustainable supply of agricultural land.

Threats to Increased Household Consumption and Global Trade

This section of the Discussion Paper seems to be based on wishful thinking. We may be on the edge of a period of depression and/or a world at war. Our defence industries might benefit, but the current belt tightening may be only a precursor to people living much more restricted lives.

Planning for a restricted future, as the defence forces do for future scenarios, may be a better way to frame this Discussion Paper's outcomes. If this does not come to be, then well and good, but if it does, at least the Government has 'war-gamed' keeping the economy afloat when unemployment may surge and growth turns negative. What measures could we take now?

The Role of New Infrastructure in Reshaping Urban Geographies

We mentioned before the big boost that the north-south corridor project will bring to the west. Adelaide Airport too will be a pivotal hub, connecting us with trade, tourism and freight as a trade gateway.

The revamped Outer Harbor passenger terminal is a crucial link in the tourism economy and the nearby Osborne precinct will also become a major contributor to revitalising and reshaping the northwest suburbs.

Impact of COVID-19 on Employment Lands

The Adelaide West region is growing quickly with the settlement of many new arrivals, often working in service economy jobs to fill vacancies. Given the projected growth of the care economy, WACRA anticipates this trend in employment demand will continue to accelerate.

As old heavy manufacturing makes way for new forms of advanced, AI driven, digital manufacturing, many of these new residents will use their higher education levels to participate in and start new businesses in this sector and creative, green economy niches.

Current Employment Land

The Adelaide West region accounts for more than 4,000ha of the 13,000ha of zoned employment land in the Greater Adelaide Region. Employment types cover traditional industry (LeFevre Peninsula), freight and logistics (Adelaide Airport, LeFevre Peninsula,

Winfield and Regency Park), knowledge intensive (Torrensville) and population serving (Beverley). These areas are all supported by existing infrastructure.

Employment Lands Role in Urban Greening

WACRA believes that the conversation about urban greening needs to be had with existing and future owners of industrial land so that vacant areas of land surrounding workplaces could contribute to meeting Adelaide's greening targets. How can GARP excite this sector to play a larger role in their custodianship of land for overall greening outcomes?

OPEN SPACE AND URBAN GREENING

Coast Park Path

WACRA has been a consistent advocate of completing the Coast Park Path, the 70km cycling and walking trail bringing the amenity of the seafront to Adelaide residents, visitors and tourists. We support the State Government's efforts to complete Stages 1 & 2 between Semaphore Park and West Lakes Shore as soon as possible so that this long-gestation project, which began under Minister Diana Laidlaw in 1992, will finally see the conclusion of this blue corridor for pedestrians and cyclists. It will be a major tourism attraction when people are able to cycle or even walk the whole length of this scenic path that provides mental and physical health benefits to our city.

Urban Greening Targets at Risk

We understand Green Adelaide is collaborating with many partners on an Urban Greening Strategy to respond to increasing the urban green cover across metropolitan Adelaide. We are starting at a low base compared with many other jurisdictions and the past 10 years of the current 30-Year Plan have seen progress towards targets go backwards as rampant clearing of private residential trees occurred with the infill policy.

Premier Malinauskas to Lead the Charge

Adelaide will have to make some tough decisions about how to achieve even this bare minimum target with resourcing, education, legislation and incentives. The most effective cities to achieve green targets are the ones where government leaders make this goal their number one personal target. We urge the Premier to join the likes of Sadiq Khan of London and Anne Hidalgo of Paris to move beyond ephemeral projects and seriously commit money, workforce and enthusiasm to a green Adelaide.

IMPLEMENTING THE GREATER ADELAIDE REGIONAL PLAN

We applaud the foundational building blocks behind the Discussion Paper as a springboard to a more equitable, green, growing Adelaide. The challenge is to find the levers for this change, igniting the vision with the business and community leaders to propel change forward.

Form Regional Future Forums

From our contribution we would also ask the planners to think about how various regional metropolitan perspectives could be factored into evaluation. What might be true in Lockleys might be very different in Lightsview. No one plan can hold all the different lived realities.

There is a benefit in detail and evidence from the local perspective, as we hope you may have appreciated by our focus on this region in our Western Roadmap.

Although there are 19 local governments in metropolitan Adelaide, planning for future outcomes once this plan is implemented, may well require collaboration through regional forums, much like planning for equitable health services has benefited from regional administration.

No one size fits all, but the local governments have a vital role to play at the local level. Short of Council amalgamations, GARP could recommend vehicles like Regional Future Forums in geographic clusters, where partnerships and collaborations could be established at the level of policy and shared planning decisions in future directions for the benefit of all. This economy of scale and working together as Green Adelaide is modelling will tend to achieve the wider outcomes you are aiming for.

Problem with 30 Year Plans

We live in a time of unprecedented change: with technology, climate, world interdependence and instability. Things have always changed. 100 years ago, we had liveable, walkable communities, often with churches at their hubs. Today, most people have never even been in a church, but they might appreciate a walkable neighbourhood for health, economic or climate change reasons.

We need to respond to the world as we see it changing and for this reason, we question the value of setting yet again, another 30-year plan. The previous plan has dated badly and is not fit for purpose one third of the way through its projected lifespan. We therefore ask that as part of preparing Adelaide for a resilient future, that you incorporate five-yearly evidence-based reviews which have the potential to modify sections, or even all of the plan.

To plan for a 30-year span is important, but the mechanisms needed to be response and adaptable when evidence changes need to be built into this GARP plan.

Ongoing Evaluation and Transparent Feedback

Ongoing evaluation will be essential to keep the plan robust and relevant. How could GARP incorporate voices of lived experience with an ongoing feedback, critique, recommendation mechanism, such as most local governments use? Quality of life is often most successful or unsuccessful in seemingly small, local details. Trends towards equality and opportunity could be reported back as they happen with an open transparent portal seeking such data.

Thank you for the opportunity to comment on this plan with some of our views on A Western Roadmap. WACRA is keen to see an emphasis on wholistic planning to avoid unintended consequences, and for the GARP to build ongoing feedback and evaluation into its operation to realise its four foundational outcomes.

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 12:29 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: Greater-Adelaide-Regional-Plan-Submission-Westside-Housing-6-November-2023.pdf

Growth Management Team,

Submission Details

Amendment:	Greater Adelaide Regional Plan Discussion Paper
Customer type:	Community Group
Given name:	Julie
Family name:	Blake
Organisation:	Westside Housing Company
Email address:	[redacted]
Phone number:	[redacted]
Comments:	Thank you for the opportunity to participate in this process by submitting the attached document.
Attachment 1:	Greater-Adelaide-Regional-Plan-Submission-Westside-Housing-6-November-2023.pdf, type application/pdf, 178.2 KB
Attachment 2:	No file uploaded
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	plansasubmissions@sa.gov.au

6 November 2023

Greater Adelaide Regional Plan Submission

About us

Westside Housing Company is a registered charity and a registered community housing provider operating in South Australia. We work alongside our colleagues in public and community housing to act as a safety net for people who are unable to access the housing system.

Founded in 1984, we provide a place to call home for more than 1,000 people in 460 homes across the Adelaide metropolitan area and the hills.

We develop, manage and own safe, sustainable, and affordable rental homes for people who are disadvantaged. We have a strong focus on women and their children leaving violence, older women, and veterans. 66% of our tenant community are women, and 50% of tenants live alone which is double 25% of the broader Australian community who live alone[1],. As quoted in the GARP Discussion Paper there has been a 78% increase in people living alone in SA over the past 30 years.

Context

Pressure on the housing system

It is well known that our housing system is in crisis, and this is disproportionally impacting people living on the lowest incomes. The. rental vacancy rate in Adelaide is at an all-time low and is the lowest in Australia at 0.3%. Coupled with high inflation and rental amounts increasing at unprecedented levels, 7.2% in the latest CoreLogic report[2] we have a pressing need to increase the supply of smaller dwellings for our community.

The confluence of these matters is placing pressure on all parts of the system not least of which the waiting list for social housing which currently contains nearly 20,000 applicants.

Low-income households can't find affordable rental near employment

A recent 2021 AHURI research paper identified that a critical part of the workforce, people on low incomes, cannot find affordable rental housing near employment centres and 71% pay an unaffordable rent over 30% of income [3]. Pathways out of poverty require social and affordable rental housing to be increased in good locations close to access to employment without expensive travel costs.

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[1] https://aifs.gov.au/research/research-reports/demographics-living-alone

[2] https://www.corelogic.com.au/news-research/news/2023/vacancy-rates-reach-new-record-lows-despite-rental-growth-easing

[3] https://www.ahuri.edu.au/research/final-reports/353

Comments

A greater choice in the right place

Ancillary dwellings

Westside Housing, alongside our colleagues in public and community housing owns houses in our portfolio with large gardens that are not financially viable to redevelop due to several factors and the gardens are unmanageable for tenants.

We have identified that the use of this excess land would be perfect to construct a secondary dwelling (often referred to using the gendered term “granny flat”) and we aim to roll out a program of installations across the portfolio.

However. after two years we have just commenced on site with the first dwelling, but the price is high due to degree of difficulty for the contractor and the low number we have through planning as well as sub-par housing outcomes for the occupants of both the existing and new dwellings due to council requirements. This has resulted in Westside Housing placing this program on hold until the barriers are removed.

Ancillary dwellings both on private and public/social housing land should be a useful part of the strategy to solve the housing crisis as they do not require land acquisitions so should be quicker and cheaper than other options and they are small which suits the increasing number of people living alone in our community.

The strategy to build ancillary dwellings in back/side gardens on existing social housing properties has been successfully implemented by the Tasmanian state government, with the Salvation Army Project 9 an example Project 9 on Vimeo.

The state government has publicly identified council barriers to the construction of these dwellings contained in development approvals and Westside Housing strongly supports the continued focus of the state government on this matter.

The current barriers encountered by Westside Housing include:

- The requirement for occupants of both dwellings to be related.
- Fencing is not allowed between the dwellings.
- Services are required to be shared which is likely to cause issues in terms of splitting water and electricity costs.
- The lengthy process through planning and the above barriers have resulted in high prices due to the small number of orders able to be placed at one time.

Planning barriers for a well-located project in Bowden

Most community housing providers have well-located properties in their portfolio that could be redeveloped but have not been due to the cost, the time, and the resources required to submit a change to the Planning Code. These projects could increase the supply of social and affordable housing particularly targeting people living alone such as older women.

Westside Housing has an example project adjoining Renewal SA's "Life's More Interesting" Bowden site and sitting alongside Park Terrace so with limited impact on neighbouring properties. The site is community housing and Westside Housing holds the title with a Statutory Charge held by the South Australian Housing Trust.

A redevelopment of the site could potentially result in 50+ dwellings but the existing Planning Code only allows circa 30 dwellings (with considerable planning risk remaining in achieving this even without a Code Amendment).

An expedited simple planning process for this site and other similar mixed social and affordable housing opportunities would assist and encourage registered community housing providers like Westside Housing to tackle a project like this without incurring high costs that would make the project unviable. The current system often precludes or minimises the desperately needed social housing outcomes due to the costs.

A favourable planning pathway, possibly sponsored by the South Australian Housing Authority whereby the planning sensitivities of any Code Amendment for a predominantly social housing mixed with affordable housing project are considered and weighted appropriately to help ensure certainty over the requested planning outcome. A simple assessment criteria and prioritised process would assist to expedite construction of potential inner-metropolitan well-located projects.

This approach should apply to not only this site but to other sites across metropolitan Adelaide where existing larger community housing redevelopment sites that are ripe for redevelopment and are adjacent to existing public transport infrastructure, shopping, health, and community precincts are provided with a smoothed planning pathway that are sponsored by Government.

This would also result in more sustainable social housing will the renewal of poor performing dwellings with high utility costs.

This is particularly applicable and apparent at this junction point with the availability of Federal Government grants and subsidies at this time i.e., the Housing Affordable Future Fund (HAFF) etc.

478 Port Road
West Hindmarsh
South Australia 5007

t. (08) 8155 6070
admin@westsidehousing.org.au

DTI:PlanSA Submissions

From: Cally Malone [redacted]
Sent: Thursday, 2 November 2023 9:17 AM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: YEC submission to GARP discussion paper.docx

> You don't often get email from [redacted] Learn why this is important

Hello

Please see attached a submission to the Greater Adelaide Regional Plan discussion paper.

Thanks

Cally Malone-Faulds
Education Coordinator - Youth Environment Council
Wednesday-Thursday

Green Adelaide
Hosted by KESAB environmental solutions
[redacted]
214 Grange Road, Flinders Park SA 5025
Marni ngadlu tampinthi ngadlu Kaurna yartanga inparrinthi
(We acknowledge that we are gathering on Kaurna Country)

Join us to create a cooler, greener and wilder metropolitan Adelaide.

The information in this e-mail may be confidential and/or legally privileged. Use or disclosure of the information to anyone other than the intended recipient is prohibited and may be unlawful. If you have received this email in error please advise by return email.

Youth Environment Council submission to the GARP discussion paper

8 members of the Youth Environment Council of South Australia (aged 11-17) met with Green Adelaide education staff to discuss the YourSay questions related to the Greater Adelaide Regional plan discussion paper. Submission content was scribed by Green Adelaide staff during discussions with young people. 1 member also responded to the questions via email.

What is most important to you?

	Member 1	**Member 2**	**Member 3**	**Member 4**	**Members 5 & 6**
Climate change	2nd priority	1st priority	1st priority	2nd priority	1st priority
Housing	1st priority	3rd priority	3rd priority	1st priority	3rd priority
Jobs	4th priority	5th priority	5th priority	5th priority	4th priority
Open green spaces	3rd priority	2nd priority	2nd priority	4th priority	5th priority
Inclusive Communities	5th priority	4th priority	4th priority	3rd priority	2nd priority

What do you like about your current local neighbourhood?

- natural areas; train line with plenty of birds, kangaroos, bush rats. Conservation parks.
- School Zone; Botanic and Adelaide HS Zones
- Library
- Community spaces
- Free public transport; tram stop to go to and from work
- Goolwa, plenty of activities, library (central), access to ovals and free activities.
- My local neighbourhood is Aldinga Beach, I love the location and the prioritisation of the natural habitat, referring to the Aldinga Scrub Conservation Park. Additionally, we have a wide spectrum of people ranging from low socio economic to wealthy. I like that we can drive onto the beach but with restrictions depending on the time of the year. I think it's awesome that we have green spaces for younger kids to run around and enjoy play equipment. We have lots of both public and private schools which is great however, I don't attend any of them and go to Woodcroft College instead.

What do you think your local neighbourhood is missing?

- Large green spaces
- Native biodiversity and overall more plants
- Clean air and needs more trees
- More trees around Goolwa (productive for a corridor so birds and animals have a safe way to travel).

- inner parts of Goolwa that could benefit from more trees
- More trees and plants, semi-industrial area, big buildings and empty spaces. Lack of native trees, preference to trees over grass.
- Thebarton, large green spaces, Kings Reserve example. Issues with football club wanting to use space and losing trees / clean air. Limited plant life and trees, need to protect and Council is not prioritising as they move forward. Noted South Road also.
- We have an amazing library with lots of seating and options however the opening hours don't support studying students. Closing at 5pm week days and 7pm Thursday, I know many kids (myself being one), who only get home at 5pm. Additionally it doesn't open at all on Sunday and Saturday is only from 10am – 1pm. Having a 24hour or just to 7pm every night would be amazing for student's to break up long study sessions and find a quiet place to get work done.
- While there are many establishments suitable for the general public a youth hub would be amazing. While we do have studio 20, with specific activities, something that was open as anytime to be a place to hangout so teens aren't wondering the shops but instead connecting. It could include things like: sports equipment, with a basketball hoop, a small gym area, studying nooks, creative art opportunities with basic instruments, class opportunities (for example, learning how to cook where the food goes to charity). The options are endless, and I think this is something my community which is full of teens could really benefit from. Especially as a place without a shopping centre, or bowling ally, those type of things. I understand that those additions aren't relative to the size and progression of our suburb so something smaller to encourage teens getting out would be perfect.
- The train line doesn't reach Aldinga which is a huge inconvenience for workers and university students especially. With such high petrol prices and general inflation buying and running a car is more expensive than ever. If the train line reached Aldinga that'd be phenomenal for so many people.
- Aside from that, we need to make Aldinga as sustainable as possible. Many people travel long distances from the suburb everyday for work, school, appointments etc. So, ensuring that we look into renewable energy sources, where we might prioritise solar power and cutting down on unnecessary emissions by having accessible and high-quality bike paths. Littering can also be a big issue, so recyclable, landfill, and dog waste bins (with dog bags available) on the most commonly walked paths. Fast food chains like McDonalds do have recyclable packaging, but people especially teens walking around don't have anywhere to dispose of them correctly. Furthermore, planting trees to attract native birds, and picnic benches for families and friends.

What part of the Greater Adelaide region would you like to live in?

City – 1 vote

North – 1 vote

South – 0 votes

East – 1 vote

West – 1 vote

Hills – 3 votes

Towns (Victor Harbor, Murray Bridge etc) - 2 votes

Outside the Greater Adelaide region/regional South Australia – 1 vote

How old will you be in 2050?

Participants will be 41-45

What's one word that best describes how you want Greater Adelaide to be in 2050 (and beyond)?'

- Welcoming
- Biodiverse
- Open – open to change. More green space. A yes vote. Like open-minded?
- Diverse
- Healthy
- Clean

What would you like Adelaide to look like in 10 years' time and beyond?

- affordable
- Inspiring
- Modern
- Ethical
- Inclusive
- Equity (everyone has access to what they need)
- Integrated – the 5 minute cities idea. You should be able to get everything you need in 5 minutes walk I.e. go to the shops, school, work.
- Have a plan for how they can make change for the future with positive effects on the environment
- Welcoming
- I like to see places of significance protected e.g. the beaches north of Adelaide. The critically endangered shorebirds to habit.
- More electric vehicles
- Renewable
- While there are many things that Adelaide holds great potential for, I think the most important goal is bringing our emissions as low as possible and having the greenest Adelaide we can. Talking both literally and figuratively, ensuring green spaces, bike paths, community gardens, solar panels etc.
- Additionally, we badly need a renewed school system, our classrooms look the same as they did 50 years ago, while the rest of the world doesn't. It's absolutely fundamental that this is reassessed and research is applied to our classrooms. Furthermore, modelling our school system on those in the Northern Hemisphere (like Finland and Denmark), which have been successful.

- Koala - I want more eucalypt trees
- Green - Roof top gardens, nature corridors, weekly rubbish group clean ups regionally, more areas in the suburbs parks that have dotted trees but aren't used for anything could be transformed to special gardens, easier access to water maybe

What would young people in 30 years' time want?

- Access to everything they need.
- More environmentally efficient alternatives to things
- Keep areas like the Botanic Gardens and make more
- To remove plastics from the ocean
- Availability of all jobs
- Look after natural areas
- More ways to recycle waste
- Less fast fashion

In the future, what type of home would you like to live in?

Townhouse – 2 votes

Apartment – 0 votes

Traditional house (not attached to another house) - 6 votes

Other – 1 vote

- I would like to live somewhere completely on my own. Or somewhere close by to natural spaces.

Who do you see yourself living with in the future?

By yourself – 4 votes

Friends/flatmates -4 votes

Parents/family - 4 votes

Other – 0 votes

How would you like to travel around the Greater Adelaide region in 15 years' time?

Car – 3 votes

Bus – 5 votes

Train – 5 votes

Tram – 5 votes

Walking – 5 votes

Cycling – 4 votes

Other – 0 votes

How can Greater Adelaide be more sustainable and respond to climate change?

- Electric vehicles
- Invest in renewable infrastructure
- Add more native plants, investing in sustainable ..
- More things within cycling/walking distance
- add more native plants, invest in sustainable options, stop mining, rid of one use plastics
- Electric vehicles, more public transport that ventures further south, have a higher carbon storage by more native plants or even not native anything helps as long as it doesn't spread (not for in remnant vegetation areas)
- Less reliability on fossil fuels
- Decrease in food waste
- Look in more sustainable options for power like nuclear, wind turbines and solar
- Introduce more green/compost bins
- Look into traditional Indigenous ways of managing and caring for land
- no limitations all single use plastics are banned, there are significantly more plants and trees, main sources are from renewables
- Recycling stations at every store and more habitat varieties and options
- All new houses should have solar panels as a mandatory requirement

What are your concerns for the future of the Greater Adelaide region?

- Little action towards climate change
- the greater community is going to continue to ignore these issues and concerns until it is too late
- That if there is no action taken from anyone as population expands the air could become a lot thicker and more polluted
- Poorer infrastructure and land degradation. More populated areas – poorer infrastructure, construction on large levels. With housing especially that home are not built well. Land degradation for rural areas – climate change impacts will be soil becoming infertile.

DTI:PlanSA Submissions

From: Woods, Bret (DTI)
Sent: Monday, 6 November 2023 4:48 PM
To: DTI:PlanSA Submissions
Subject: Youth Inc Submission
Attachments: IMG_1157.jpg; IMG_1161.jpg; IMG_1160.jpg; IMG_1158.jpg; IMG_1163.jpg; IMG_1162.jpg; IMG_1159.jpg; IMG_1164.jpg; IMG_1165.jpg; IMG_1166.jpg; IMG_1208.jpg; IMG_1207.jpg; IMG_1167.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

OFFICIAL

Feedback provided from Youth Inc's school students for inclusion.

Images included and text below.

Cheers,

B

Public Transport sucks.
The cost of paying for public transport on a minimum wage is prohibitive.
Getting a license is expensive.
Employers are asking for a full license.
There are barriers to getting a license if you have a disability.
There are a lot of barriers to getting a license if you have a disability.

Training does not translate to real jobs. So you can't stay healthy.

What makes great transport we need more public transport we need accessibility screens on all bus stops.
We need to use technology for diverse disabilities to be able to use public transport.
Bus drivers are grumpy and don't care. We need friendlier welcoming bus drivers.
We need more trains. Sometimes it takes two hours to commute to work on the bus.
If you're out after midnight, you can't get home. We're told to be safe, but we can't be safe.
Public transport is not affordable.
We need to expand the tram and train network coverage.
Scooters are great, but they're too expensive. And when they're discarded randomly they create obstacles for wheelchairs and prams.
We need very cheap or even better, we need free public transport.
Cars are a problem. Cars are the traffic. But if you don't own a car, but if you don't own a car, there's no there's sometimes no other way to get around.
Adelaide Metro should be publicly owned and free for young people.
Transport should engage access consultants and people with diverse disabilities to plan public transport.
It needs to include sign language and 'how to use the bus' on the bus.

What sort of housing do you need?

Quite literally anything that I don't have to move out of in a year.
Our family has been homeless four times. Because we have disabilities and my grandfather has dementia.
We need more pathways for young people to rent to be able to 'rent to buy'
Nobody can afford the houses that are being built.
There is not enough affordable housing.
It's not right that people profit off of our basic housing needs.
We need better public housing and more options.
There needs to be a clear pathway to obtain public housing.
We are not homeless so we're not high risk enough to get public housing.
The quality of Co-housing needs to improve.
We need quality choices and choose who you get to live with. You need to have some control over who you get to live with.
Tiny homes would be great as one option.
Co-housing needs to be well managed.
We need communal living to have shared garden spaces and outdoor spaces there's not enough green space in apartment living.
Not having easy access to green spaces is depressing.
There is not a one size fits all for Community Housing.
UCity (Uniting communities) is an excellent example for young people in transitional housing.
We need to increase the socio economic and cultural diversity of our suburbs to make unsafe suburbs safer and to make 'rich people suburbs' more welcoming.
We need to support rich people who live in 'rich people's suburbs' to be more welcoming.

We need local shops and villages to be walkable.
The ring route around Adelaide is great.
We need more trees. We need greater tree cover.
We need public spaces for young people to go and hang out without having to spend money.
We need to make sure that there's a home for every kind of family from single people to integrated intergenerational living.

Shared housing needs smaller bathrooms but more storage space.

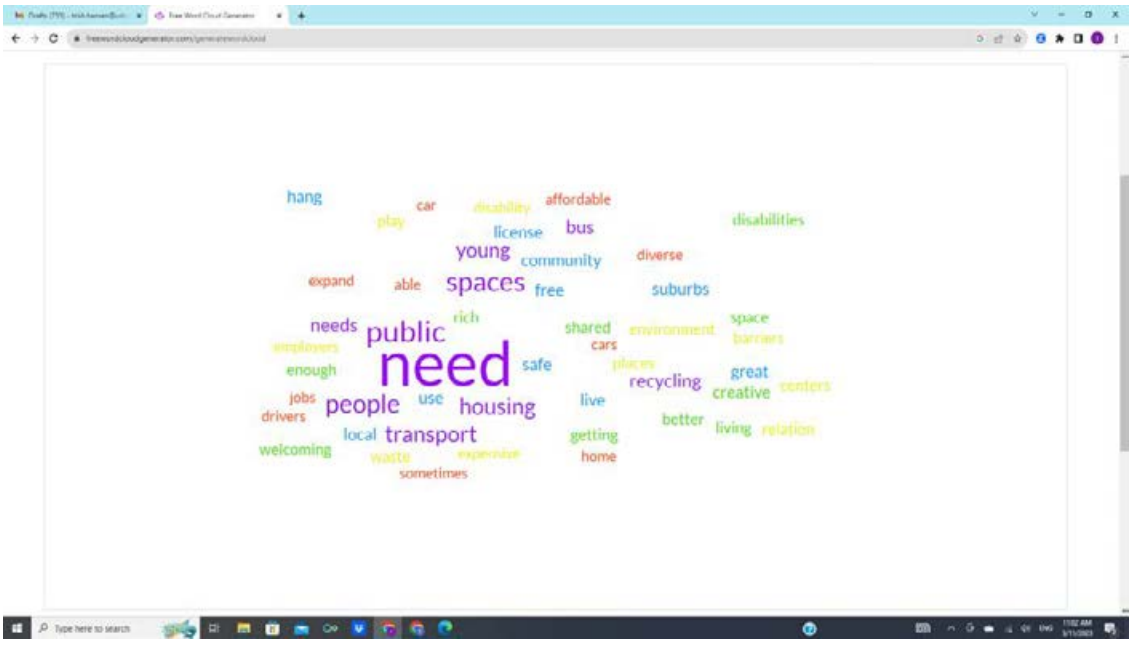
What do you need to have fun, play and for recreation?

We need places for young people to hang out without having to spend money.
We need more public markets.
We need safe community gaming spaces.
We need free things.
We need animal friendly spaces to live.
We need spaces to hang out to study with toilets, charging ports, Wi Fi.
Sensory sensitive spaces in shopping centers and shared housing.
Tonsley is cool. You can skate there. We need more places for people to skate under cover.
We need creative spaces, community creative spaces where people can explore making arts and crafts
It's more than festivals - you don't need a festival to be more creative.
You need a space to hang out.
We need more color more murals, public art.
We need opportunities for the creation of community. Public art can do that.
We need more free shit.

We need to incorporate the natural environment into new building projects.
We need to replace what we've lost in relation to the environment.
We need to incorporate natural spaces or sensory spaces in buildings.
We need to plant more native species.

We need to prioritize the environment as part of building projects.
In relation to waste.
We need local collection facilities.
Local recycling centers, like public transport where you can walk to your local recycling center.
We need to have them incorporated in neighborhoods.
We need more safe places for cycling.
We need better separated recycling in public bins.
It's disgusting that we can't recycle food waste and other materials in public spaces.
We need to reduce waste.
We need more education on recycling.
We could use all bins to do this.
We need to raise the profile of recycling and reinforce and socialize recycling in public spaces, especially in shopping centers.

In relation to jobs we need to regulate the amount of profit employers can make off of employees.
We need to embed social justice education in schools.
We need to expand young people's perspectives throughout their schooling.
Young people still want to play and be creative.
We need to play spaces and playgrounds for young adults - for wellbeing



Encourage alternative learning and streams of unconventional study

LOCAL LEARNING OPPORTUNITIES

Hands on learning

More free workshops that is hands on because a lot of people learn through this.

more spaces like the botanic gardes. Smaller areas throughout the city and further kid focused/ parks

Nature parks that are physically accessable to all especially transport

More first Nation spaces and areas we can learn from

Equipment to hire/ borrow to be active or help us.

OPEN SPACE AND RECREATION

Leisure

-sensory spots for people, like ~~in~~ in shopping malls, parks, museum/art gallery

more free shit to do

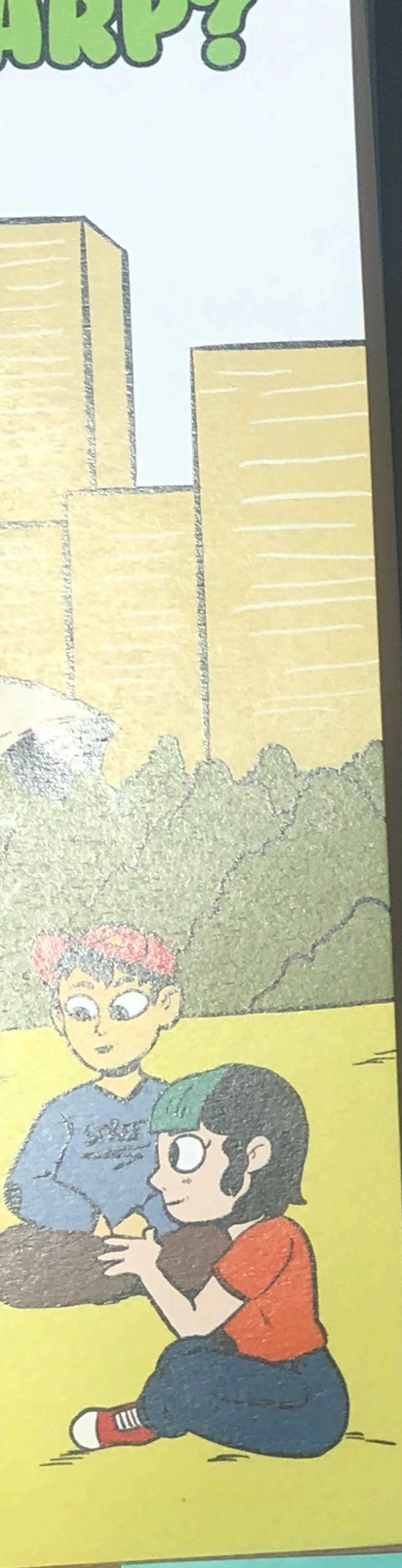
community places like art spaces

Bring back what we've lost → environment + native.

MORE WATER FOUNTAINS (FOR DRINKING + BOTTLE REFILLS)

More area that has lighting so that at night time it feels safe to be there.

Less smoking areas



SAFER STREETS AND SPACES

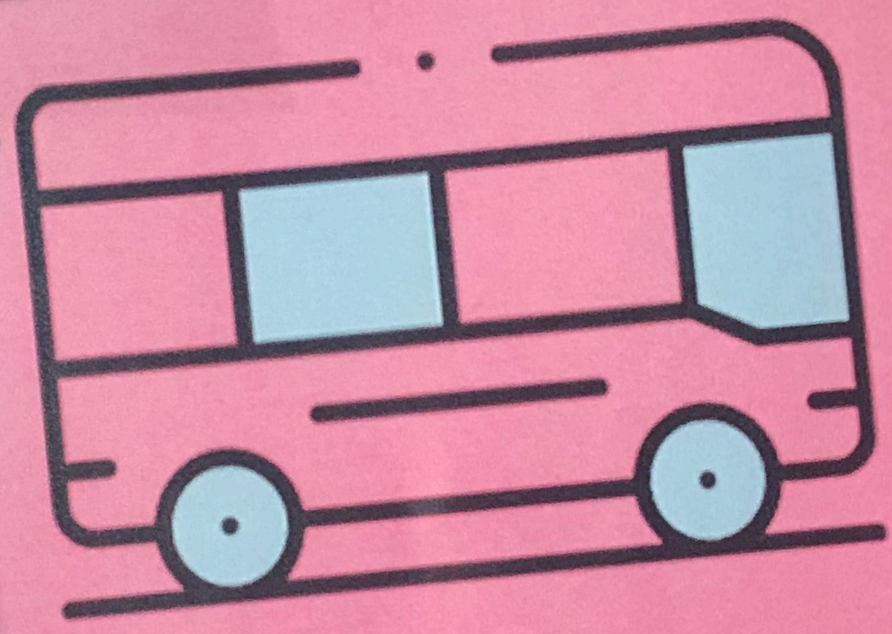
More drug/substance abuse support & safe spaces

Safe using spaces - so people can be safe.
Dedicated smoking zones with ash trays & seating, so people don't litter or affect non smokers

More bike-friendly and safe roads and paths

MORE NON-DIGITAL + EASILY ACCESSIBLE BUS TIMETABLES (THEY ARE HARD TO READ!)

Easily accessable place for people to recharge metro-cards



PUBLIC TRANSPORT OPTIONS

Public transport

- Access consultant (from disabled people)
- more regular + consistent buses/trains

Jobs

- more lived experience roles

It's very difficult for people that are new to renting to have previous refrences, we need to find a way for this

Housing
- communal living; many houses on one block for groups of friends or extended families to share. Shared gardens, outdoor areas, easy to access for friends.

HOUSING CHOICES AT ALL STAGES OF LIFE

We need houses that allow our pets so we dont have to give them up or risk homelessness

MORE SUPPORT FOR YOUTH LIVING IN THE CBD

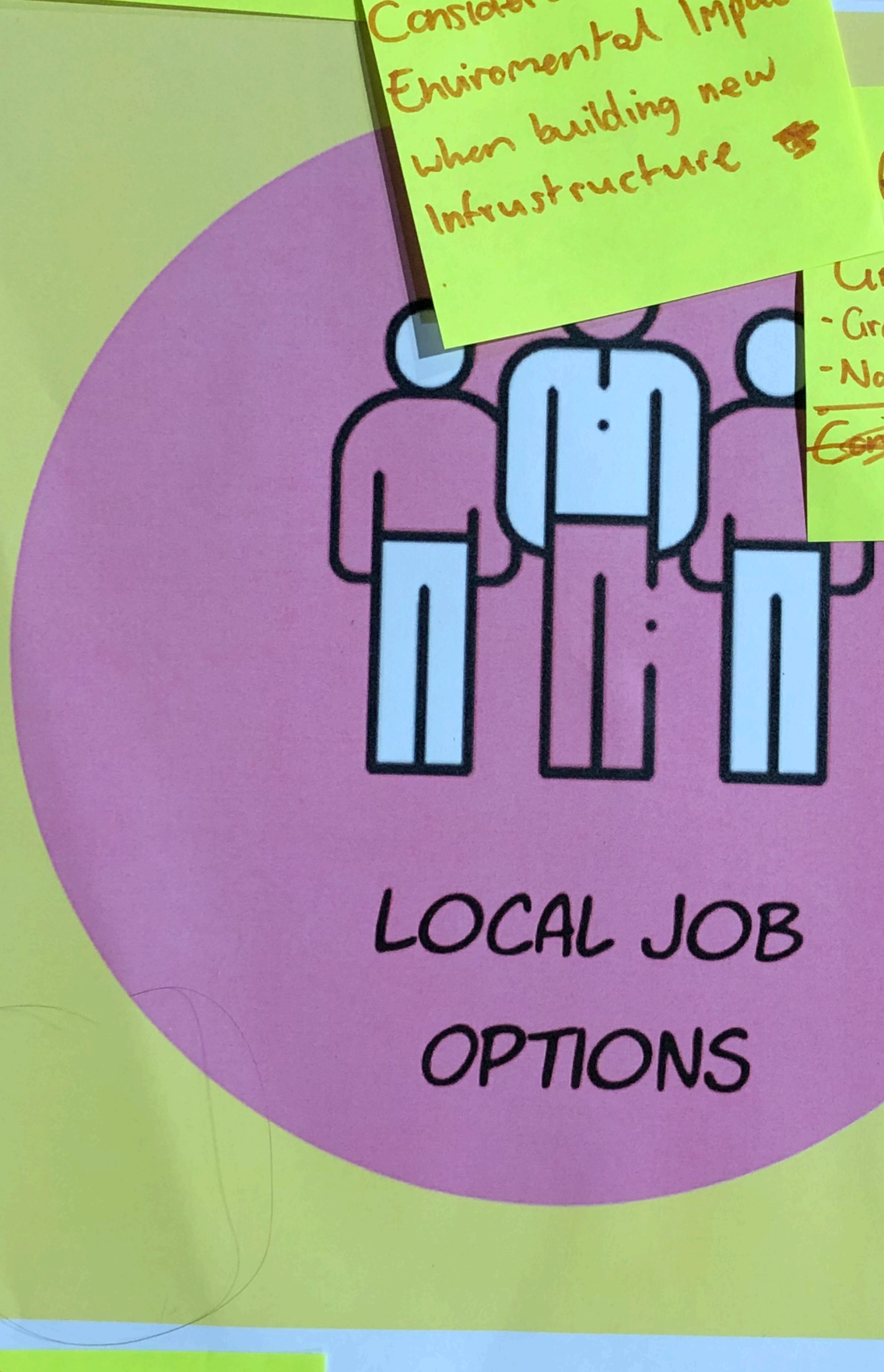
More job/pathway options
- more options for people to get experience

Less unpaid pathways

More flexible hours + work conditions

Better/More Thought-ful Consideration of Enviromental Impact when building new Infrustructure

More shared "Green" Spaces
- Growing food
- Native Plants
~~Consideration of Enviro. stuff~~



Rent Caps
Also Property Caps:
3 per person idk

Employers to have better understanding of disability

Employers to be more strengths based

Support
For new
renters

- Support with paper work
- rental assistance
- Someone to help read the rental agreement with so everyone understands

MORE SUPPORT FOR HOME LEANERS ESPECIALLY IN YOUTH

Affordable/Accessable housing needs to be a human right

Countries like Finland have denoid that providing basic housing for youth can Reduce the economic impact on communities

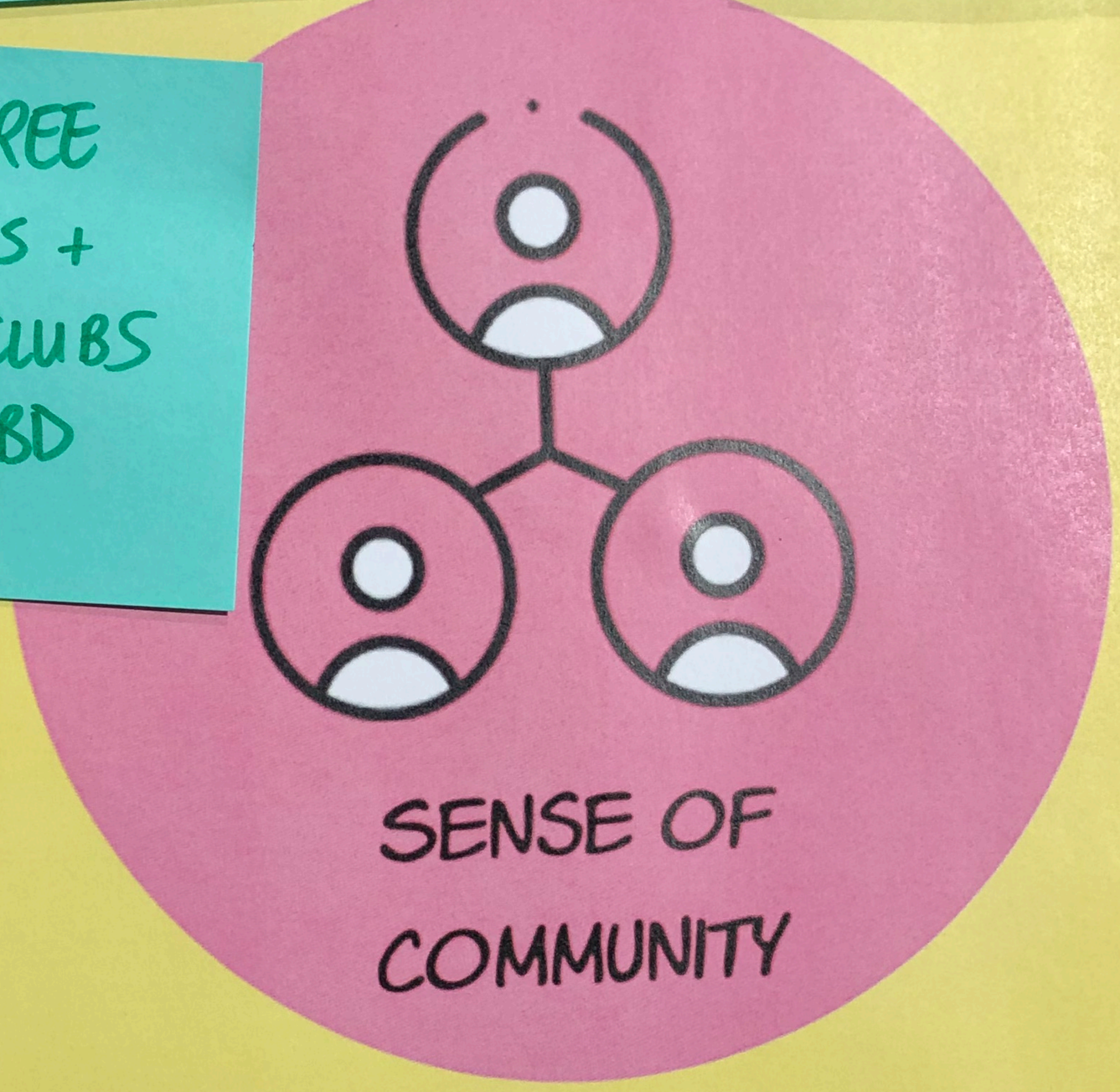
More support + safety for homeless people

More queer, neurodiverse and disability welcoming spaces

More spaces for minors of those groups to hang safely

All age group inclusive activites. Help us meet new people!!

MORE FREE ACTIVITIES + GROUPS / CLUBS IN THE CBD

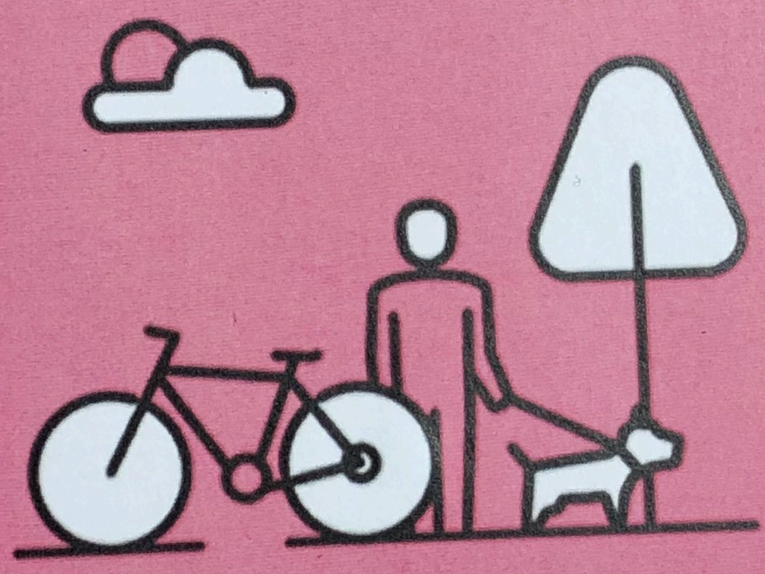


More community workshops. Help us to connect and grow new skills

MORE COMMUNAL SPACES FOR PEOPLE TO JUST HANG OUT / RETREAT

MORE BIKE LANES + ~~STORAGE~~ PARKING SPACES

More walkways/ sidewalks for easier walking



WALKABILITY AND ACTIVE TRAVEL

Areas throughout city focused on people not cars.
walking trails, bike trails
dog parks.

More spaces for Street artist to express themselves.

Community event communication Need to be better

MORE UNDER 18 EVENTS + SAFE SPACES

Other cities get night-time art / lights. Please bring this here, we have so many amazing artist

ARTS, CULTURE AND EXPERIENCES

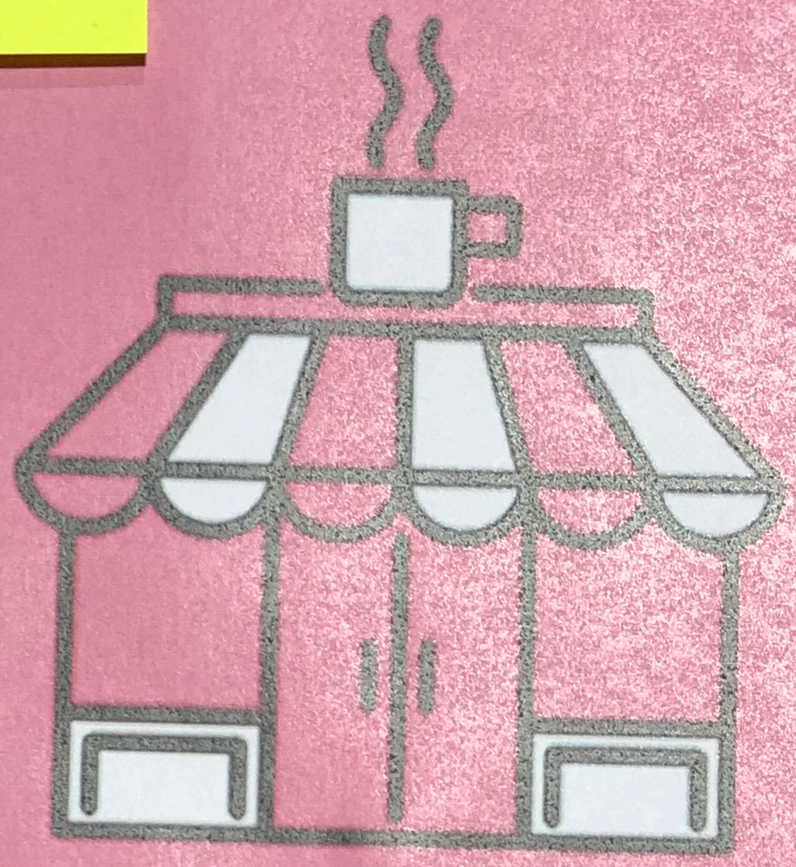
Environment
- move renewable energy
- less reliance on cars → encouraging foot traffic + walkable communities
- pay people to recycle cans + bottles but for other stuff

Perminent art market Spaces.
- Similar to the melbourne markets.
- Art, music, food, activitys.

You don't need a Festival to have a community like a community art spaces

More mental health support!!

fund services for complex mental health, not just emergency 'quick' support - it leaves vulnerable people struggling.
More lived experience support roles.



EVERDAY SHOPPING AND SERVICES

More AFFORDABLE Places to buy food/ eat out in the CBD

More space for local business

2 / Nov / 2023.

1. Have upgraded comunity pin boreds so that small Bussnies[can better connect with the community.
-protected by glass you'd go into the shop the bords attached to.
you'd go into the store and ask to display things.

2. Make all service animals allawetto enter shop/stave/pubic transport/

3. Change the age limitt for registering a metro card. you don't need to be 18 to own a metro card so Why do you need to be 18 to register them?

4. Add posters with pictures/drawings of sings showing intrustions on how to use the busess/trams/buses.

5. pulse button's meed at least forghtnightly matinence.

6. the bus numbers on the busses need to be darker for those who are colarbind + vision imared.

7. benches + pluse button's at EACH bus stop.

8. Seprete bus to take to hospitals (for those who's injuries or emergancys don't warrent an ambluance buts still require medical attention).

9. More buses into the country (PLEASE) the contry needs some of the City's resources, help us.

10. more appitynitys for the youth to be inroled in the disisions that affect there Lives.

focus on green spaces through the city. Really makes a difference especially in high density living. (trees, grass ~~flowers, ect~~)

Some comunity spaces in the hills have free or cheap activitys like pottery, ink art and weeving. This would be great in the city in public spaces like librarys. not only for kids, for everyone (teens, adults, kids)

Jobs

Work experience help in School. To find a job you need work experience but where do you get work experience? Work! but where do you get work?

community spaces / lireing

blocks of houses, apartments or share houses.
We are social beings! We need socilisation!
Share gardens with fresh food, Day care / kids spaces
activitys, arts.

Community market spaces like in melbourne.
free rent areas for people starting out in small bussines. Hand made, fresh food, arts, music ect.